

EXHIBIT G1

UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION

In Re	*	Case No. 22-50073 (JAM)
	*	
HO WAN KWOK and GENEVER	*	Bridgeport, Connecticut
HOLDINGS CORPORATION,	*	June 29, 2023
	*	
Debtor.	*	
	*	
* * * * *	*	

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE JULIE A. MANNING
UNITED STATES BANKRUPTCY JUDGE

#1831 INTERIM APPLICATION FOR COMPENSATION FOR PAUL HASTINGS LLP, TRUSTEE'S ATTORNEY FEE:\$12,326,802. EXPENSES \$348,813.54

#1851 INTERIM APPLICATION FOR COMPENSATION FOR NEUBERT, PEPE & MONTEITH, P.C., TRUSTEE'S ATTORNEY FEE: \$561,718.50; EXPENSES \$0

#1870 APPLICATION PURSUANT TO BANKRUPTCY CODE SECTIONS 327(e), 328(a) and 3,(a), BANKRUPTCY RULES 2014 and 2016 and LOCAL BANKRUPTCY RULES 2014-1 and 2016-1, AUTHORIZING AND APPROVING RETENTION AND EMPLOYMENT OF SAXE DOERNBERGER & VITA, P.C. AS SPECIAL INSURANCE COVERAGE COUNSEL

Proceedings recorded by electronic sound recording,
transcript produced by transcription service.

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APPEARANCES:

Chapter 11 Trustee:

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New York, NY 10166

For the Chapter 11 Trustee:

G. ALEXANDER BONGARTZ, ESQ.
Paul Hastings LLP
200 Park Avenue
New York, NY 10166

PATRICK R. LINSEY, ESQ.
Neubert Pepe & Monteith, PC
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For the U.S. Trustee:

HOLLEY L. CLAIBORN, ESQ.
Office of the U.S. Trustee
150 Court Street
New Haven, CT 06510

For the Creditors Committee:

IRVE J. GOLDMAN, ESQ.
Pullman & Comley
850 Main Street
Bridgeport, CT 06601

1 (Proceedings commenced at 10:05 a.m.)

2 THE COURTROOM DEPUTY: Case No. 22-50073, Ho Wan
3 Kwok and Genever Holdings, LLC.

4 THE COURT: Good morning. If we could have
5 appearance for the record starting with the Chapter 11
6 Trustee please.

7 MR. DESPINS: Good morning, Your Honor. Luc
8 Despins, Chapter 11 Trustee.

9 THE COURT: Good morning.

10 MR. BONGARTZ: Good morning, Your Honor. Alex
11 Bongartz, of Paul Hastings, for the Chapter 11 Trustee.

12 THE COURT: Good morning.

13 MR. LINSEY: Good morning, Your Honor. Patrick
14 Linsey of Neubert Pepe & Monteith, Connecticut counsel for
15 the Trustee.

16 THE COURT: Good morning.

17 MS. CLAIBORN: Good morning. Holley Claiborn for
18 the U.S. Trustee.

19 THE COURT: Good morning.

20 MR. GOLDMAN: Good morning, Your Honor. Irve
21 Goldman, Pullman & Comley, for the Creditors Committee.

22 THE COURT: Good morning.

23 All right. So there are three matters on the
24 calendar this morning, two are fee applications and one is
25 an application to employ counsel.

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1 How would you like to proceed, Trustee Despins?

2 MR. DESPINS: I can start with the application to
3 retain the counsel, if that's okay.

4 THE COURT: Go right ahead. Yes. Thank you.

5 MR. DESPINS: Thank you, Your Honor. And good
6 morning again. Luc Despins, Chapter 11 Trustee.

7 And this is the application to retain the firm of
8 Saxe Doernberger & Vita. They're based in Connecticut. And
9 the fee application is at docket 1870.

10 And they are -- they were retained to handle
11 insurance coverage disputes relating to AIG, as Your Honor
12 is familiar because you've interacted with them already.

13 And we filed the application. And we received no
14 objections. And, therefore, subject to any changes you may
15 have to the order we would ask the Court to enter the order.

16 THE COURT: The only question I have with regard
17 to the engagement of this counsel is, and I apologize, I
18 don't have it in front of me so I don't recall, is are they
19 being paid on an hourly basis?

20 MR. DESPINS: Yes.

21 THE COURT: Okay.

22 MR. DESPINS: Yes, they are, Your Honor.

23 THE COURT: All right. And they're -- and they'll
24 be submitting fee applications?

25 MR. DESPINS: Correct, Your Honor.

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1 THE COURT: Okay. The only reason I asked is
2 sometimes I miss if there's some other form of compensation
3 requested under 328 at the beginning --

4 MR. DESPINS: Yeah.

5 THE COURT: -- of a -- of a retention of
6 professional, but I didn't think that was true in this case.
7 But I didn't recall.

8 MR. DESPINS: It's hourly rates, Your Honor.

9 THE COURT: Okay. Thank you.

10 I don't -- I do not have any questions.

11 I understand why you would like to retain special
12 counsel and the documents that I've seen certainly support
13 the application.

14 I'm looking at the proposed order. And the only
15 reason I asked the question was because of the reference to
16 328. But it's 328(a) which is the Trustee's ability to
17 retain counsel. So I don't have a problem with it.

18 But does anyone else wish to be heard on the
19 application to employ special insurance counsel?

20 MS. CLAIBORN: Just briefly, Your Honor.

21 The U.S. Trustee filed a statement of no objection
22 to the application. That's at ECF 1941.

23 THE COURT: Okay. Thank you.

24 MS. CLAIBORN: And just to be clear the reference
25 to 328 in the application in no way interferes with the

1 ability of the Court or the U.S. Trustee or creditors to
2 opine on the reasonableness of the fees when they're sought.

3 THE COURT: Yeah. Often, and I saw that when I
4 looked back at the retention of Paul Hastings and Neubert
5 and Pepe as well, often 328 isn't mentioned. It's just 327.

6 So I just -- I like to make sure when 328 is
7 mentioned that no one is, and no one is in this case, but
8 insisting that there's some kind of compensation that's set
9 from the beginning.

10 Because as you all know there's a lot of case law
11 that says, you know, you can't touch that once that's done
12 or it's very limited ability. So that's fine.

13 The only thing that I don't see, and maybe I
14 missed it, so let's just -- let me -- oh, it is there --
15 it's there, I just -- effective May 11. That's what I'm
16 asking. What was the date that they retained as of and it's
17 May 11th. I see it now in paragraph 2 of the ordered
18 paragraphs.

19 So does anyone else wish to be heard?

20 MR. GOLDMAN: Just the committee has no objection,
21 Your Honor.

22 THE COURT: Okay. Thank you.

23 As I stated already, I've reviewed the
24 application. I understand why the Trustee is seeking to
25 retain special counsel. Certainly understand under the

1 specific facts and circumstances of the cases in the
2 adversary proceeding involving the insurance the need for
3 special counsel to deal with or help the Trustee deal with
4 the insurance issues.

5 No one has filed any written objection to the
6 application to employ. There is no one participating in
7 this hearing today that is objecting to the application to
8 employ. The United States Trustee's Office has filed a
9 statement of no objection with regard to the application to
10 employ, which is ECF No. 1941.

11 For all those reasons the application is granted
12 and the proposed that was submitted with the application can
13 enter.

14 MR. DESPINS: Thank you, Your Honor.

15 I would just point out that they are not only
16 insurance coverage counsel, but also local Connecticut
17 counsel --

18 THE COURT: Sure.

19 MR. DESPINS: -- because Mr. Linsey's firm --
20 actually, we can say that it's Mr. Linsey's firm because
21 he's now a partner at his firm -- that has a conflict and
22 that was my way of mentioning that he made partner.

23 THE COURT: That he did or did not?

24 MR. DESPINS: He did. He did. Just did.

25 THE COURT: Oh, well, congratulations, Mr. Linsey.

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1 MR. LINSEY: Thank you, Your Honor.

2 MR. DESPINS: So they're also local counsel so
3 that, you know, that covers that.

4 Thank you, Your Honor.

5 THE COURT: Okay. Thank you.

6 MR. DESPINS: So the next matter I would move on
7 to would be the interim application for -- to retain -- to
8 pay Paul Hastings.

9 And, Your Honor, so that I'm not going to take a
10 lot of time on this, but I would -- there are two aspects I
11 want to cover.

12 One is I want to describe and reflect the
13 settlements that were agreed to with the U.S. Trustee and
14 the committee.

15 And then I'll have very short, very short
16 editorially comments about some aspects of the fees here.

17 But first, on the settlements, as you can imagine,
18 in the background there are a lot of discussions that were
19 taking place with both the U.S. Trustee and the committee.
20 One of the issues that was being discussed was the issue of
21 holdbacks.

22 And our initial position was that there should be
23 no holdbacks during the case because there's a contingent
24 fee deal and we haven't gotten paid. And on top of that
25 there was a built-in holdback because this application only

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1 covers through February. So there's March, April, May,
2 June, plenty of money to cover a holdback.

3 But the counter from their point was, which was a
4 good one, which is, well, what stops you from filing an
5 application on Friday that brings all that up and there will
6 be no holdbacks at all?

7 And so we agreed as part of this back and forth
8 that any future application would be subject to a 20 percent
9 holdback provided that we -- that we're getting paid -- and
10 this applies to all professionals in the case -- on a more
11 regular basis which we defined at no more than 60 days.

12 So, for example, we're not going to file an
13 application tomorrow, but if we did, and it is heard and
14 paid, subject to Your Honor's decision to allow or not
15 allow, within 60 days, then there would be 20 percent held
16 back for the rest of the case for that application.

17 And the concept there is if now we're getting --
18 we have money, we're getting into a more regular mode where
19 -- where fee applications can be heard and can be dealt
20 with.

21 And so that was the agreement that was reached,
22 which is that there will be a 20 percent holdback going
23 forward for all future fee applications provided that we are
24 operating in this normal mode which is defined as, you know,
25 no more than 60 days or so.

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1 So that's -- so that's the first part on
2 holdbacks. I wanted to mention that discussion with the
3 U.S. Trustee and with the committee on that.

4 The second part is the U.S. Trustee raised a
5 number of issues with some of the time entries. And to give
6 you some examples, too many lawyers at a hearing or vague
7 entries.

8 And so to be candid with you counsel for the U.S.
9 Trustee was correct on some of the issues regarding too many
10 lawyers at a hearing, although frankly sometimes I was alone
11 at a hearing, but I guess that doesn't -- that doesn't
12 counter that argument, but she was right on that issue.

13 And on a vague entry we -- it's all subject to
14 disagreement.

15 We didn't agree with the bulk of her comments, but
16 at the end of the day we agreed to a \$550,000 reduction,
17 Your Honor, which we think is substantial to address all
18 these issues.

19 And we've -- I would say we took on some comments
20 that the U.S. Trustee had in terms of making it easier for
21 the U.S. Trustee and for parties in interest and for the
22 Court to ascertain the value provided with respect to
23 adversary proceedings.

24 So from now on the next applications that are filed
25 will have every adversary proceeding billed separately so

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1 that we can look at the adversary proceeding and say, wow,
2 you know, it cost us more than we recovered, which would not
3 be good, or hopefully it will be, no, we recovered more than
4 we spent. But I think that it was a very good suggestion.

5 We're going to implement that going forward so all
6 future fee applications will have separate categories for
7 each adversary proceeding so that the Court can see that.

8 I would say on the reduction I don't think -- I
9 don't want this to be precedent setting in a sense that we
10 now know what issues were raised, we're not going to
11 hopefully repeat these issues, so that -- so that we won't
12 be in the same position, but clearly in order to get this
13 resolved with the U.S. Trustee we agreed to the \$550,000
14 reduction. And as I said we think it's a material
15 reduction.

16 So before I move on to what I call my short
17 editorial comments, maybe the committee or the U.S. Trustee
18 wants to address this aspect of -- or later -- it's up --

19 MR. GOLDMAN: Well, I did want to mention it
20 wasn't my understanding that the future 20 percent holdbacks
21 would be subject to any shortening of the time for filing
22 fee applications under Section 331.

23 We have no objection to the Court doing that 60
24 days or even a shorter period, but it wasn't my
25 understanding that this agreement with the committee was

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1 conditioned on the Court doing that.

2 THE COURT: You can have a conversation. Go
3 ahead.

4 (Pause)

5 MR. DESPINS: We want the Court to reduce the time
6 to hear and decide fee applications to a 30-60 day period.

7 But counsel is right that I'm taking the risk that
8 the Court would refuse to do that and would only hear fee
9 applications on a four-month interval which is in the
10 statute. I'm sorry. He's correct.

11 THE COURT: Okay.

12 MR. DESPINS: And there's no relief pending before
13 the Court on that.

14 THE COURT: Right.

15 MR. DESPINS: We hope that Your Honor will do
16 that, but I'm taking a risk that the Court will refuse to do
17 that. So that covers the committee.

18 MR. GOLDMAN: Yes.

19 MS. CLAIBORN: Your Honor, with respect to the
20 U.S. Trustee's points on the reductions requested, we did
21 reach a consensual number which is memorialized in the
22 statement that I filed on the docket at ECF 1949.

23 If the Court has any questions about that, I'm
24 happy to answer them.

25 THE COURT: I'm not sure I have questions per se.

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1 I think that I can understand the discussions that
2 have -- were had and Trustee Despins said about certain
3 entries being vague or having many -- too many lawyers at a
4 hearing or things like that.

5 I will say that I agree with Trustee Despins that
6 this is not some kind of precedent set in this case if and
7 when further fee applications are filed. I think every fee
8 application has to be reviewed separately from any fee
9 application that's been filed previously.

10 I think that in connection with this case and what
11 I have observed in this case that the -- there has been --
12 this has been a heavily litigated case to put it mildly.

13 And I think that the Trustee has attempted to keep
14 costs and fees in a range that is reasonable under the very
15 specific and detailed circumstances of this -- these cases
16 and the numerous adversary proceedings.

17 And so I completely understand the discussions. I
18 think the discussions are healthy. I think they should
19 happen. I've no issue with that. But I don't think it
20 should be something that everyone expects on a going-forward
21 basis.

22 The Court, as you know, has an independent
23 obligation to review the fees as well. Otherwise why am I
24 here, right? I mean, there's really no point.

25 So there are -- I mean, I think anyone could go

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1 through any fee application of any magnitude, whether it's a
2 thousand dollars or \$12 million, and make a determination or
3 suggestion that time should be reduced.

4 But I don't -- I want to be clear that I don't --
5 I will not -- someone will not be successful in arguing
6 before me, well, that was done last time so you should do it
7 again. That will not be a successful argument.

8 This is a very -- I mean, I don't have to tell
9 anybody in this room this is a very unusual case that has
10 been heavily, heavily litigated at every step. I can't
11 think of -- I guess today maybe is the only day we haven't
12 had an objection which is fascinating in and of itself.

13 But, you know, every single time something has
14 been filed there's an objection, there's the discovery
15 disputes, often for whatever reason we all come ready to
16 think that there's going to be a controversy and then
17 there's some resolution, but the Trustee had to prepare for
18 that and be ready for that.

19 And so all I want to say is, again, of course you
20 should have these conversations. They're very -- they can
21 be very productive and they should happen.

22 But I just want to be very clear that that does
23 not mean that I expect that every fee application that's
24 filed should have a voluntary reduction, number one.

25 Number two, even if it doesn't have a voluntary

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1 reduction, the Court may reduce it. The Court may look at
2 something and say, you know, I don't think that is
3 reasonable under the circumstances of the case.

4 I do think the suggestion of billing separately or
5 accounting separately for the time in the adversary
6 proceedings at this point is a good suggestion given where
7 things stand now and how they've developed. But as we all
8 know things change in this case every day. One minute we're
9 going down one road and the next minute we're going down
10 another.

11 And this is not a case that fits in my opinion
12 into the mold of where you could draft a litigation plan of
13 how you're going to handle this case.

14 And so for those reasons I just wanted to be clear
15 that this does not set any precedent in this case with
16 regard to an expectation that any professional must reduce
17 their fees, with the comment that doesn't mean they won't be
18 reduced. Okay?

19 But there's no -- I'm not -- this case is -- you
20 know -- as you know, I've looked by the way at the fee
21 applications and the time entries that are, you know, what,
22 four or five inches thick and the work appears very
23 reasonable to me under the circumstances of this case.

24 Now, someone could say that's a lot of money, and
25 that's true, but the Trustee did -- from my perspective with

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1 regard to this fee application and the time frame that is
2 covered by this fee application, the Trustee and Connecticut
3 counsel for the Trustee have not -- I see no evidence in the
4 fee application entries which I looked at --

5 Now, did I study every single entry, of course
6 not, I can't.

7 But I looked at the time entries. I looked at
8 them. I looked at the categories. I looked at the
9 breakdown of the amounts by category.

10 But I don't -- I did not see an entry that
11 concerned me, that made me think why did they do that? Or
12 that seems unnecessary. Or I didn't see an entry that, you
13 know, which happens some times, where it was mistakenly put
14 in from another case. I mean, that's happened before. You
15 know, somebody makes a mistake. You know, that happens.
16 It's not a -- nobody did it on purpose.

17 I didn't see anything that raised any concern from
18 the Court's perspective. And I think that this is a case
19 that required the staffing that occurred up to this point.
20 Up to the point, you know.

21 What's going to happen from this point forward,
22 who knows, right? Things we don't know. That's the --
23 that's what happens in this case. We don't know from day to
24 day how it's going to be. So I just -- I just want to be
25 clear about that. I think I have been. I've probably said

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1 it three times now.

2 But I just think that the dollar amount, while
3 high, appears to me to be reasonable under the very specific
4 circumstances of this case.

5 And the expenses as well. I mean, you know, we
6 all know what it costs to do these things especially if
7 you're met every step of the way with opposition.

8 And I have no idea, but I would -- if the Court --
9 if it was known what was spent by counsel opposing all these
10 things, I think we'd find that would be a high number as
11 well.

12 So I have no problem with the agreement that
13 you've reached. And I think I need a new order though,
14 don't I?

15 MS. CLAIBORN: You do.

16 MR. DESPINS: Yes. And I believe Mr. Bongartz
17 sent a draft to the courtroom deputy this morning.

18 THE COURT: Okay. I haven't seen it yet. But
19 that's not your -- I mean, you know, we've been working so
20 we probably just didn't know that it was there yet.

21 But I would assume that when I look at the
22 original proposed order the differences would say that
23 you've agreed to a reduction.

24 MR. DESPINS: Yes.

25 THE COURT: That is has the dollar amounts in it.

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1 That you say that there was a hearing held today that -- I
2 don't know if you said it in the -- if you need to have said
3 it, but we can put in today's date. If that's all we need
4 to put in, we can put it in.

5 MR. DESPINS: But there were other changes, Your
6 Honor, I should point out to Your Honor.

7 They're not material but Mr. Kindseth asked that
8 we incorporate by reference the DIP order. Remember about
9 disgorgement and all that? And we've agreed to do that.
10 That's in the revised order that you have.

11 THE COURT: I was going to say not the DIP order.

12 MR. DESPINS: No, the sale.

13 THE COURT: There is no DIP. That was withdrawn.

14 MS. CLAIBORN: The sale.

15 MR. DESPINS: Okay.

16 THE COURT: Yeah.

17 MR. DESPINS: I'm talking about another case now.

18 THE COURT: That's okay. That's okay.

19 MR. DESPINS: Yeah. The sale order.

20 THE COURT: So what's the reference that he wants
21 in there?

22 MR. DESPINS: Remember that there was a -- the
23 provision that you correctly pointed out that Ms. Guo should
24 not be a party to -- it's that provision that says that if
25 they win in the Supreme Court that they own it --

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1 THE COURT: Oh, that the monies, they could get
2 monies back from the estate?

3 MR. DESPINS: From the estate. And if there's no
4 money in the estate, from the professionals that got the
5 money. So that's us.

6 THE COURT: Okay. Okay. I understand.

7 MR. DESPINS: So we've added that.

8 We also added other requests of counsel for the
9 U.S. Trustee, some language that -- because Your Honor
10 ordered a number of parties to pay 78 or \$73,000 in fees.
11 We haven't collected on that yet so there's a provision --

12 THE COURT: In connection with the sanctions
13 orders?

14 MR. DESPINS: Exactly.

15 THE COURT: Yes.

16 MR. DESPINS: That if we ever collect that we need
17 to give a credit in the next fee app, so we added that
18 language.

19 THE COURT: Okay.

20 MR. DESPINS: And I believe that's all that was
21 added.

22 THE COURT: Okay. That's fine. That's fine.

23 And I'm looking at what was the original proposed
24 order and --

25 MR. DESPINS: And we had put the local rule --

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1 THE COURT: Right.

2 MR. DESPINS: -- provision --

3 THE COURT: Right.

4 MR. DESPINS: -- regarding disgorgement.

5 THE COURT: Yeah. And it does say -- and no
6 objection to the application having been filed, and that is
7 accurate.

8 You know what? I might change -- it says and no
9 objection to the application having been filed by the Office
10 of the United States Trustee. And in the absence of any
11 other objection to the application. Well, that's right. So
12 that's fine.

13 I just want to make it clear that no one's filed
14 an objection, which I think it is. Okay.

15 So I -- you know, for the reasons that I've just
16 stated, and for what the Court's obligations are with regard
17 to a fee application, with regard Paul Hastings and the fees
18 and expenses incurred from the period of July 8th, 2022
19 through February 28th, 2023, I find that the fees and
20 expenses sought are reasonable and that they were necessary
21 under the circumstances of the case.

22 Now, we could argue that it's -- they were
23 unfortunately necessary, but they were necessary. And it
24 wasn't through -- there's been no demonstration in the fee
25 application that I've seen that there were any tasks or time

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1 incurred that were inappropriate under the -- under what was
2 the charge given to the Trustee to investigate the affairs
3 of the debtor in connection with the appointment of the
4 Chapter 11 Trustee.

5 And I appreciate the conversations between the
6 U.S. Trustee and the Trustee.

7 And I appreciate the statement filed by the
8 Trustee, United States Trustee, regarding that they had no
9 objection to the fee application in connection with an
10 agreement to reduce the fees and no one else having filed
11 any objection to the fees.

12 Does anybody else wish to be heard before I rule?

13 MR. GOLDMAN: Your Honor, just briefly.

14 I didn't want the Court to think the committee was
15 just rolling over on this. We did scrutinize the
16 application, came to pretty much the same conclusion Your
17 Honor came to after getting over the initial sticker shock
18 of the number.

19 But I think from our perspective on calmer
20 reflection it was more of a function of the hourly rates,
21 which were disclosed at the outset, so we really couldn't
22 take issue with that.

23 And recognizing as Your Honor has said the
24 difficult issues that were confronted in this case, the
25 progress that's been achieved thus far, which the committee

1 is pleased with, and given all of the litigation activity,
2 relatively expeditious time period in which things have
3 flowed in the case, and recognizing really the substantial
4 resources that Paul Hastings brought to bear on this case
5 which started out with no assets and now it's quite a
6 different story, so that's how we came out on it, Your
7 Honor.

8 THE COURT: Thank you.

9 MR. GOLDMAN: Thank you.

10 THE COURT: Does anyone else wish to be heard?

11 (No response)

12 THE COURT: All right. I am looking at the
13 proposed order now that you did submit this morning. The
14 courtroom deputy sent this to me. And just give me a
15 moment, but it looks fine from what I've seen so far. I'm
16 just not -- I just need to finish it.

17 Oh, you know what we could do with the order?
18 Just in the second sentence of the order we'd just say after
19 notice and a hearing held on June 29, 2023, okay?

20 THE COURTROOM DEPUTY: Yeah.

21 (Pause)

22 THE COURT: I'm looking at that additional
23 paragraph regarding the sanctions at the moment.

24 The only thing I might add to that, although I
25 don't remember if the order says this so I'm looking at both

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1 of you, I can look, it won't take me long, but aren't they
2 jointly and severally liable on those?

3 MR. DESPINS: They are.

4 MR. GOLDMAN: Yes.

5 MR. BONGARTZ: They are.

6 THE COURT: Okay. I don't know that it says that.
7 I wouldn't mind if it did. It says -- I think we can just
8 say -- no, we can do it -- I mean, it can say are jointly
9 and severally obligated to pay.

10 MR. DESPINS: Okay.

11 MS. CLAIBORN: That's fine.

12 MR. DESPINS: Your Honor, we'll do that change.

13 THE COURT: Yeah. We'll do that change.

14 I'd like -- you know, who knows if this is going
15 to be appealed, right?

16 So I'd like the district court to understand as
17 clearly as possible what's happened so that they don't have
18 to do the work if there's an appeal. Okay?

19 So I'm looking -- I'm turning to the courtroom
20 deputy, do you see where I am in paragraph 4?

21 THE COURTROOM DEPUTY: Yes. After the parentheses
22 of HK?

23 THE COURT: Right. So it will say are jointly and
24 severally obligated. Okay? You can have me look at it,
25 whatever, you know, after, but I think that's -- I know the

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1 order says that, but I'd like it to say -- I would like that
2 same language to be in this order.

3 MR. DESPINS: I would just say, Your Honor, you
4 mentioned the district court, there's a lot of activity in
5 the district court at this point, meaning appeals, state --

6 THE COURT: I've heard.

7 MR. DESPINS: You know, that was part of my
8 speech, so I'm not going to go through that, but over 36-37
9 years I thought I'd seen it all, but I've never seen a
10 double stay pending appeal. What I mean is that both courts
11 being asked to stay at the same time. Never seen that.
12 Never seen a mandamus which they filed.

13 I mean, I was telling Ms. Claiborn that I've often
14 dreamt about filing a mandamus before a judge that ruled
15 against me, but I've never seen, ever seen that.

16 So there's a lot of activity in the district court
17 at this point.

18 THE COURT: I understand both of those things that
19 you just said and I guess we'll see what happens.

20 I mean, it's in the district court's hands
21 obviously. Whatever the district court's going to do, the
22 district court is going to do.

23 I do know -- I did appreciate knowing that Judge
24 Dooley did deny the motion for stay pending appeal because
25 then I don't have to rule on that. That helps.

1 And I know I understand that there's a writ of
2 mandamus out there in which the docket indicates that I'm a
3 defendant. Although I think that's not accurate. I think
4 that's just the way the clerk's office has to -- I don't
5 know that though -- but I think it's the way the clerk's
6 office to note it.

7 And then I think it's completely up to the
8 district court to determine what if anything will happen
9 with that writ of mandamus, including whether or not the
10 district court may ask some party in this case to file
11 pleadings. So I have no idea.

12 No, I hadn't seen one of those either actually.

13 MR. DESPINS: As I said, I've dreamt a lot about
14 that in other cases, but I've never actually seen it.

15 THE COURT: Well, I've seen it in a context of a
16 motion where there was other relief sought before the other
17 court, but not in the commencement of an action. I hadn't
18 seen that.

19 But, you know, we should all go back and read
20 *Marbury vs. Madison* so maybe we'll --

21 MR. DESPINS: Exactly.

22 THE COURT: -- understand what that -- once we
23 read that again. But that wasn't involving a judge, so
24 we'll see.

25 In any event, I'm looking at the proposed order

Ho Wan Kwok - June 29, 2023

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1 that was submitted this morning. And with the changes that
2 I noted on the record and that are agreeable to the parties
3 that are here today, the application for compensation of
4 Paul Hastings, LLP for the period of July 8th, 2022 through
5 February 28th, 2023 is granted and the proposed order with
6 the minor changes noted on the record will enter.

7 MR. DESPINS: Thank you, Your Honor.

8 THE COURT: Thank you.

9 MR. LINSEY: Good morning, Your Honor.

10 THE COURT: Good morning.

11 MR. LINSEY: Patrick Linsey, Connecticut counsel
12 for the Trustee and conflicts counsel here for my firm
13 Neubert, Pepe & Monteith. I won't take up a lot of time.

14 I was involved on behalf of my firm in the
15 conversations that the Trustee discussed with the U.S.
16 Trustee and with the committee regarding holdbacks and fee
17 applications going forward and I understand the parameters
18 that we're operating under.

19 I could -- I could talk about what led to the
20 filing of this fee application, but I feel like everyone on
21 this courtroom has pretty much lived it together at this
22 point.

23 There is one thing that I'll briefly touch on,
24 which is I think not always the shiniest and most exciting
25 part of the case, it's sort of the ducks' feet under the

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1 water if you will, but it's also sort of an apt analogy
2 because it's in some ways what powers the case, which is the
3 investigation that's been going on while we've been doing
4 all this litigation.

5 I think there have been five omnibus 2004 motions
6 that have been granted, that's on top of three initial 2004
7 motions that have been granted, all of which refer -- all of
8 which dealt with numerous examinees, dozens and dozens, into
9 the hundreds I believe at this point, of examinees,
10 something that my office and I have been very much involved
11 in.

12 And that hasn't necessarily been court work, but
13 particularly in this case where the Trustee has not had
14 financial advisors, forensic accountant professionals, where
15 we've really had to have attorneys doing that work to move
16 this investigation forward, it's taken a lot of time. It's
17 taken a lot of resources.

18 But I think that the results are evident when
19 there are adversary proceedings that are filed with initial
20 requests for injunctive relief that are supported by
21 voluminous evidence, discreet facts showing why that relief
22 is appropriate. Those facts weren't handed to us on a
23 platter. Those facts were really from the sweat of many
24 brows in the form of that investigation.

25 So particularly, I suppose for me, in addition to

1 the work you've seen here in court because of the role as
2 conflicts counsel, obviously with a large firm like Paul
3 Hastings there are a number of examinees where we've had to
4 do, you know, grab the oar with respect to some of the
5 investigating, that's been a large part of the case.

6 And I think -- I think there have been positive
7 developments for the estate and I'm optimistic there will be
8 more positive developments for the estate.

9 So with that having been said my firm did have a
10 conversation with Attorney Claiborn for the United States
11 Trustee. Ms. Claiborn raised certain issues. We didn't
12 agree on all the issues, but we did agree that a \$10,000
13 reduction to the fee application was appropriate. That's
14 been agreed to. Otherwise I'm not aware of any objections
15 to the fee application.

16 So we would ask that the Court enter the order
17 granting the fee application.

18 To the extent the Court would be willing to do
19 that, I would suggest one of two things.

20 One, the only change to our proposed order that
21 I'm aware of is entering the date of the hearing and --

22 THE COURT: We can take care of that.

23 MR. LINSEY: -- and reducing the number in
24 paragraphs 1 and 2 from 561,718.50 to 551,718.50. So if the
25 Court can --

Ho Wan Kwok - June 29, 2023

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1 THE COURT: It's 10,000 even?

2 MR. LINSEY: Correct. Ten thousand even, Your
3 Honor.

4 But beyond that I'm not aware of any other changes
5 that are necessary unless the U.S. Trustee and the committee
6 have any comments with respect to our application.

7 THE COURT: The only thing I am --
8 I'm sorry.

9 MS. CLAIBORN: Yeah.

10 THE COURT: Why don't I hear from you first,
11 Attorney Claiborn.

12 MS. CLAIBORN: I was just going to state the
13 obvious which is the U.S. Trustee is on board with the
14 \$10,000 reduction as evidenced by the statement that I filed
15 on the docket at ECF 1950.

16 And I concur with Attorney Linsey that there are
17 no other changes that need to be made to the order other
18 than to adjust the math.

19 THE COURT: Okay. Thank you.

20 Just so -- so the record is clear, what I -- what
21 I've commented on the record about the application of Paul
22 Hastings, I agree with the application, those comments are
23 applicable to the application of Neubert, Pepe & Monteith as
24 well.

25 I did review the time entries. As I said did I

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1 review every single time entry? No. But I reviewed a good
2 amount of them. And I reviewed the categories of tasks
3 performed, the amounts, the dollar amounts associated with
4 those categories.

5 It was easy for me in both situations to see where
6 the most fees were incurred, and they were incurred in
7 categories where I would think the most fees should have
8 been incurred.

9 So I, again, think the fees and expenses are
10 reasonable and absolutely necessary under the circumstances
11 of the very specific circumstances of these jointly
12 administered Chapter 11 cases, and the numerous adversary
13 proceedings, and the injunctive relief that's been sought,
14 and the issues with regard to appeals, and all the things
15 we've already talked about.

16 So I have -- again, there was nothing that stood
17 out to me as any area of concern.

18 With regard to the voluntary reduction, again, as
19 I've already said, I think those conversations are very good
20 to have. And I think that, you know, you've come to an
21 agreement. And that's fine.

22 But, again, I don't want there to be a belief that
23 that has to happen every time, with the understanding that I
24 could be the one that decides that there is a need for a
25 reduction. Okay? But I might not. You never know. You

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1 just don't know. It depends upon the facts and the
2 circumstances of the case.

3 With regard to your proposed order, the only other
4 change I'm going to make, and the courtroom deputy and I can
5 do this, is I just want to cite to the statutes at the
6 beginning of the order, like the Paul Hastings' order does,
7 you know, pursuant to Sections 328, 330 and 331.

8 MR. LINSEY: I'm sorry.

9 THE COURT: That's okay.

10 MR. LINSEY: I wasn't aware that Mr. Kindseth's
11 ask applied to my firm, but I suppose it's fair. We're fine
12 doing that too.

13 THE COURT: You mean the same language that --

14 MR. LINSEY: The same language. Would you like us
15 to --

16 THE COURT: That same paragraph 4, essentially?

17 MR. LINSEY: Yeah. Okay. It's fine.

18 Would you like us to submit an order? Your Honor,
19 could -- the Court could copy and paste that language from
20 the --

21 THE COURT: We can copy and paste it.

22 MR. LINSEY: Okay.

23 THE COURT: We'll keep the fees down for today as
24 much as we can. Okay?

25 MR. LINSEY: Thank you, Your Honor.

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1 THE COURT: But I -- you know, as I said, nothing
2 stood out or gave me pause in connection with these
3 applications because of the facts and circumstances that
4 we've all encountered in these cases. Okay?

5 So did the committee wish to be heard?

6 MR. GOLDMAN: Your Honor, no objection from the
7 committee for largely the same reasons articulated for Paul
8 Hastings except for the hourly rates. But we have -- we saw
9 it as Your Honor saw it.

10 THE COURT: Well, that's a reality of geography I
11 suppose. Right? As we all know.

12 But in any event we can take care of those
13 changes.

14 The Court finds that, as I said, the fees and
15 expenses are reasonable and necessary. No one has filed any
16 written objection. There's no one participating in this
17 hearing today that's objecting to the fee application. The
18 United States Trustee's Office has filed a statement of no
19 objection in connection with the agreement, further
20 reduction of the fees by \$10,000.

21 For all those reasons the application is granted
22 and the proposed order will enter.

23 MR. LINSEY: Thank you, Your Honor.

24 THE COURT: Okay. Thank you.

25 We'll make those minor changes, Attorney Linsey,

1 that we talked about. We can do that.

2 MR. LINSEY: Thank you, Your Honor.

3 THE COURT: So, you know, again, I do think that
4 all that has occurred as far as the fees and expenses have
5 -- are reasonable and necessary and have produced results
6 for this estate which is in a very different place than it
7 was a year ago today. And that was --

8 You know, the appointment of the Trustee was
9 designed to see if that could happen and to see if -- that
10 was the whole point.

11 All the -- the creditors had come in and said
12 there needs, you know, there needs to be an investigation,
13 there's all kinds of things going on. That was why a
14 trustee was appointed. The investigation has yielded
15 results in a -- in a very -- in less than a year, under very
16 difficult circumstances. So I -- that's very much
17 appreciated by the Court. And we'll have to see where
18 things go from here.

19 I think obviously the point of this is for the
20 benefit of creditors.

21 And so there have to be -- attorneys have to be
22 paid in order to try to reach a result that is for the
23 benefit of creditors.

24 And while the amounts may seem high I -- from July
25 8th, 2022 to February 28th, 2023, I think they're

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reasonable.

So I don't know if anyone wishes to discuss any other matters today, otherwise I think -- I think we are -- we do not have any further hearings in these cases until July 11th, is that correct?

MR. DESPINS: That's my understanding, Your Honor.

THE COURT: Okay. All right. Well, have a nice 4th of July. And thank you all very much.

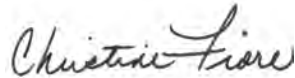
MR. DESPINS: You as well.

ALL COUNSEL: Thank you, Your Honor.

THE COURT: We do not have another matter on the calendar until 12 p.m., so court is in recess until 12 p.m.

(Proceedings concluded at 10:51 a.m.)

I, CHRISTINE FIORE, court-approved transcriber and certified electronic reporter and transcriber, certify that the foregoing is a correct transcript from the official electronic sound recording of the proceedings in the above-entitled matter.



July 7, 2023

Christine Fiore, CERT

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
HO WAN KWOK, <i>et al.</i> ,	:	Case No. 22-50073 (JAM)
	:	
Debtors. ¹	:	Jointly Administered
	:	
	X	

THIRD INTERIM FEE APPLICATION COVER SHEET

Interim Application of:	Paul Hastings LLP	
Time Period:	From: July 1, 2023	To: August 31, 2023
Bankruptcy Petition Filed:	February 15, 2022 (main chapter 11 case)	
Date of Entry of Retention Orders:	August 2, 2022 [Docket No. 668] (effective as of July 8, 2022, as to Individual Debtor) and January 24, 2023 [Docket No. 1376] (effective as of October 11, 2022, as to Genever (BVI) and effective as of November 3, 2022, as to Genever (US))	
Amounts Requested²	Reductions	
Fees: \$3,725,984.25	Voluntary Fee Reductions: \$124,820.25	
Expenses: \$146,137.57	Voluntary Expense Reductions: \$634.80	
Total: \$3,872,121.82		
Fees Previously Requested:	Retainer Request:	
Requested Fees: \$20,447,892.26	None	
Awarded Fees: \$19,842,892.06		
Paid Fees: \$18,106,880.40		

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

² In accordance with the Interim Compensation Procedures Order (as defined below), Paul Hastings previously received payments in the amount of \$1,389,424.80 and \$116,812.50 in expenses with respect to its monthly fee statement for July 2023. Paul Hastings has not received, and is currently not seeking, payment of its fees and expenses with respect to its monthly fee statement for August 2023 (although 80% of such fees and all such expenses may be paid, at a future date, in accordance with the Interim Compensation Procedures Order). In addition, while this Application seeks allowance of all fees incurred during the Fee Period, Paul Hastings is not seeking, at this time, payment of the 20% holdback with respect to the July 2023 and August 2023 fee statements.

Expenses Previously Requested:

Requested Expenses: \$626,360.12
Awarded Expenses: \$626,360.12
Paid Expenses: \$626,360.12

Expense Detail:

Retainer Received: Not applicable
Copies per page cost and total: \$0.08 b/w (per page)
\$0.20 color (per page)
\$5,735.52 (total)

INTERIM FEE REQUESTS TO DATE

Date Submitted / Docket No.	Period Covered	Requested Fees	Requested Expenses	Fees Awarded and Paid; Court Order	Expenses Awarded and Paid; Court Order	Amount Owing
Expense Reimbursement Application for the Period from July 8, 2022 through October 31, 2022³						
3/1/23 Docket No. 1495	7/8/22 - 10/31/22	\$0.00	\$63,631.75	\$0.00	Awarded: \$63,631.75 Paid: \$63,631.75 Docket No. 1693, entered on 4/21/2023	\$0.00
Special Fee Application (Sanctions) for Services Rendered in Securing Compliance with Court-Authorized Subpoenas⁴						
4/10/23 Docket No. 1648	9/28/22 - 3/10/23	\$83,370.26	\$0.00	Awarded: \$83,370.26 Paid: \$0.00 Docket No. 1693, entered 4/21/2023	\$0.00	\$83,370.26
First Interim Fee Application for the Period from July 8, 2022 through February 28, 2023						
5/30/23 Docket No. 1831	7/28/22 - 2/28/23	\$12,326,802.00	\$348,813.54	Awarded: \$11,776,802.00 Paid: \$11,776,802.00 Docket No. 1964, entered on 6/29/23	Awarded: \$348,813.54 Paid: \$348,813.54 Docket No. 1964, entered on 6/29/23	\$0.00
Second Interim Fee Application for the Period from March 1, 2023 through June 30, 2023						
8/4/23 Docket No. 2051	3/1/23- 6/30/23	\$8,037,720.00 (net of \$20,096.25 credit) ⁵	\$213,914.83	Awarded: \$7,982,720.00 Paid: \$6,330,078.40 Docket No. 2190, entered on 9/12/23	Awarded: \$213,914.83 Paid: \$213,914.83 Docket No. 2190, entered on 9/12/23	\$1,652,642.60
Total						
				Awarded: \$19,842,892.26 Paid: \$18,106,880.40	Awarded: \$626,360.12 Paid: \$626,360.12	

³ The First Interim Fee Application excluded the expense reimbursements requested in the Expense Reimbursement Application.

⁴ The First Interim Fee Application and the Second Interim Fee Application included the amounts sought in the Special Fee Application (for the period through February 28, 2023 and the period from March 1 - 10, 2023, respectively). Paul Hastings included these amounts not to recover twice but to ensure payment in the event the HK Parties (defined below) do not comply with the Sanctions Order (defined below). To be clear, Paul Hastings seeks to recover payment of the requested \$83,370.26 only once.

⁵ Due to an inadvertent oversight, the monthly fee statements for January and February 2023 (which were covered in the First Interim Fee Application) did not reflect the voluntary reduction in the hourly rate of the Trustee (from \$1,975 to \$1,860 per hour), resulting in an overstatement of Paul Hastings' fees by \$20,096.25 with respect to these two months. This amount was credited in the Second Interim Fee Application against fees requested therein.

MONTHLY FEE REQUESTS FOR THIRD INTERIM FEE PERIOD⁶

Date Submitted / Docket No.	Period Covered	Requested Fees (80%)	Requested Expenses (100%)	Fees Paid	Expenses Paid	20% Fee Holdback
Third Interim Fee Period from July 1, 2023 through August 31, 2023						
9/7/23 Docket Nos. 2180 and 2228	7/1/23 - 7/31/23	\$1,389,424.80	\$116,812.50	\$1,389,424.80	\$116,812.50	\$347,356.20
9/20/23 Docket Nos. 2218 and 2228	8/1/23- 8/31/23	\$1,621,148.20	\$29,325.07	\$0.00	\$0.00	\$405,287.05
Total		\$3,010,573.00⁷	\$146,137.57	\$1,389,424.80	\$116,812.50	\$752,643.25

⁶ On August 18, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 2094] (the “Interim Compensation Procedures Order”), pursuant to which estate professionals (including Paul Hastings) commenced filing monthly fee statements.

⁷ As detailed below, as an accommodation to these estates and to minimize the review process by the Court and parties in interest, Paul Hastings is not seeking allowance or payment at this time for the fees of twenty one (21) timekeepers who billed less than five (5) hours during the Fee Period in the aggregate amount of \$37,232.00; however, such fees were included in the July and August fee statements filed and served on September 7, 2023 and September 20, 2023, respectively.

**HOURS AND RATES PER PROFESSIONAL AND PARAPROFESSIONAL
DURING FEE PERIOD**

Name	Department; Date of First Admission	Hourly Rate Billed	Hours Billed	Total Fees Billed in this Application	Number of Rate Increases Since Case Inception
Partners (3)					
Bassett, Nicholas	Corporate, 2007	\$1,625.00	261.10	\$424,287.50	1
Bassett, Nicholas (travel; ½ rate)	Corporate, 2007	\$812.50	8.50	\$6,906.25	1
Cota, Alex	Corporate, 2012	\$1,725.00	7.20	\$12,420.00	N/A
Despins, Luc	Restructuring, 1986	\$1,860.00	218.30	\$406,038.00	N/A
Despins, Luc (travel; ½ rate)	Restructuring, 1986	\$930.00	4.30	\$3,999.00	N/A
Partner Total:			499.40	\$853,650.75	
Of Counsel (4)					
Bongartz, Alex	Restructuring, 2007	\$1,625.00	172.00	\$279,500.00	1
Bongartz, Alex (travel; ½ rate)	Restructuring, 2007	\$812.50	1.30	\$1,056.25	1
Luft, Avi	Corporate, 2000	\$1,625.00	385.20	\$625,950.00	1
Luft, Avi (travel; ½ rate)	Corporate, 2000	\$812.50	18.90	\$15,356.25	1
Traxler, Katherine	Restructuring, 1990	\$1,025.00	7.40	\$7,585.00	1
Of Counsel Total:			584.80	\$929,447.50	
Associates (13)					
Barron, Douglass	Corporate, 2012	\$1,320.00	314.50	\$415,140.00	1
Catalano, Kristin	Corporate, 2021	\$915.00	107.50	\$98,362.50	1
Farmer, Will	Corporate, 2018	\$1,235.00	235.20	\$290,472.00	1
Ganapathi, Anuva	Litigation, 2021	\$915.00	11.60	\$10,614.00	1
Grabias, Maria	Corporate, 2016	\$1,290.00	16.30	\$21,027.00	N/A
Kim, Sarah	Litigation, 2023	\$855.00	9.10	\$7,780.50	N/A
Koch, Leonie	Corporate, 2023	\$855.00	9.20	\$7,866.00	1
Kosciewicz, Jon	Litigation, 2021	\$915.00	102.10	\$93,421.50	1
Maza, Shlomo	Corporate, 2012	\$1,320.00	152.50	\$201,300.00	1
Sadler, Tess	Corporate, 2019	\$1,175.00	14.40	\$16,920.00	1
[redacted]	Corporate, 2023	\$815.00	353.90	\$288,428.50	1
[redacted] (travel ½ rate)	Corporate, 2023	\$407.50	7.00	\$2,852.50	1
Sutton, Ezra	Corporate, 2021	\$1,015.00	307.50	\$312,112.50	1
[redacted]	Corporate, 2022	\$915.00	29.40	\$26,901.00	
Associate Total:			1,670.20	\$1,793,198.00	
Paraprofessionals (2)					
Kuo, Jocelyn	Paralegal	\$540.00	92.80	\$50,112.00	N/A
Mohamed, David	Paralegal	\$540.00	184.40	\$99,576.00	1
Paraprofessional Total:			277.20	\$149,688.00	
TOTAL:			3,031.60	\$3,725,984.25	
BLENDED HOURLY RATE:		\$1,229			

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
HO WAN KWOK, <i>et al.</i> ,	:	Case No. 22-50073 (JAM)
	:	
Debtors. ¹	:	Jointly Administered
	:	
	:	
	X	

**THIRD INTERIM FEE APPLICATION OF PAUL HASTINGS LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PERIOD FROM
JULY 1, 2023 THROUGH AUGUST 31, 2023**

Pursuant to sections 105(a), 328, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Connecticut (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 2094] (the “Interim Compensation Procedures Order”), Paul Hastings LLP (“Paul Hastings”), as counsel to (a) Luc A. Despins, in his capacity as the chapter 11 trustee (the “Trustee”) appointed in the chapter 11 case of Ho Wan Kwok (the “Individual Debtor”), (b) Genever Holdings Corporation (“Genever (BVI)”), and (c) Genever Holdings LLC (“Genever (US)” and, together with Genever (BVI), the “Genever Debtors”), hereby files this *Third Interim Fee Application of Paul Hastings LLP for Compensation and Reimbursement of Expenses for the*

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

Period from July 1, 2023 through August 31, 2023 (the “Application”). By this Application, Paul Hastings requests allowance and payment² of the compensation for professional services performed by Paul Hastings attorneys (including the Trustee³) and reimbursement of its actual and necessary expenses incurred during the period from July 1, 2023 through and including August 31, 2023 (the “Fee Period”). In support of this Application, Paul Hastings respectfully states as follows:

PRELIMINARY STATEMENT

1. During the Fee Period, the Trustee and Paul Hastings continued the investigation into the financial affairs of the Individual Debtor and his corporate “shell game” to shield companies and assets under his ownership and/or control from his creditors. Given the vast network of companies affiliated with the Individual Debtor, and the fact that these companies or their assets are located around the world, the Trustee’s investigation was, and continues to be, extensive. For example, to date, the Trustee’s investigation has included, among other things, (a) seeking discovery under Bankruptcy Rule 2004 from hundreds of individuals and entities connected with the Individual Debtor and his various businesses, (b) analyzing thousands of documents produced in response to the Trustee’s Rule 2004 subpoenas, (c) deposing several targets of the Trustee’s Rule 2004 discovery, (d) interviewing former employees and business

² In accordance with the Interim Compensation Procedures Order (as defined below), Paul Hastings previously received payments in the amount of \$1,389,424.80 and \$116,812.50 in expenses with respect to its monthly fee statement for July 2023. Paul Hastings has not received, and is currently not seeking, payment of its fees and expenses with respect to its monthly fee statement for August 2023 (although 80% of such fees and all such expenses may be paid, at a future date, in accordance with the Interim Compensation Procedures Order). In addition, while this Application seeks allowance of all fees incurred during the Fee Period, Paul Hastings is not seeking, at this time, payment of the 20% holdback with respect to the July 2023 and August 2023 fee statements.

³ In accordance with the Retention Order (as defined below), the Trustee is authorized to act as one of the attorneys for the Individual Debtor’s estate, and, accordingly, this Application also seeks allowance of the Trustee’s fees in such capacity. For the avoidance of doubt, in this Application, references to services provided by Paul Hastings attorneys shall include the Trustee. To be clear, time spent by the Trustee in his capacity as chapter 11 trustee, is not part of this Application, and compensation therefor will be sought by separate application.

associates of the Individual Debtor (including several communications with confidential informants), (e) researching property records, and (f) pursuing litigation to recover property of the estate.

2. In addition, during the Fee Period, as part of the Trustee's continuing efforts to recover assets for the benefit of this estate, the Trustee commenced or continued to prosecute, with the assistance of Paul Hastings, several adversary proceedings. As detailed below, in these adversary proceedings, as a result of the Trustee's and Paul Hastings' efforts during the Fee Period, the Trustee has secured numerous valuable injunctions, judgments, and settlements, as well as obtained access to tens of millions of dollars in escrow funds.

- During the Fee Period, the Trustee continued to prosecute the interpleader action commenced by U.S. Bank N.A. ("US Bank") to resolve a dispute regarding the release of \$33 million in funds (the "Escrow Funds") held by U.S. Bank.
 - Shortly after the end of the Fee Period, the Court granted the Trustee's summary judgment motion and authorized the Trustee to **remove the \$33 million in Escrow Funds from the segregated account and deposit such funds into the estate's general account(s).**
- During the Fee Period, Paul Hastings attorneys handled all matters arising out of the appeal of this Court's rulings that HK USA is an *alter ego* of the Individual Debtor and that the \$33 million held in escrow by U.S. Bank are property of the estate. In that appeal, the appellees, *i.e.*, HK International Funds Investments (USA) Limited, LLC ("HK USA") and Mei Guo (*i.e.*, the Individual Debtor's daughter), **sought a stay pending appeal, which the United States District Court for the District of Connecticut (the "District Court") denied.**
- During the Fee Period, the Trustee, Genever (BVI), and Genever (US) reached a settlement with Bravo Luck LLC ("Bravo Luck") and the Debtors' son, Mr. Qiang Guo with respect to the adversary proceeding challenging Bravo Luck's asserted beneficial interest in the 18th floor apartment at the Sherry Netherland Hotel (the "Sherry Netherland Apartment"). As a result of the settlement, the Trustee, Genever (US) and Genever (BVI) obtained the primary relief they sought in the Bravo Luck Adversary Proceedings—namely, **undisputed beneficial**

ownership and control of the Sherry Netherland Apartment. The settlement was approved by this Court on August 30, 2023.

- During the Fee Period, the Trustee continued to prosecute his adversary proceeding against HCHK Technologies, Inc. (“HCHK Technologies”), HCHK Property Management, Inc. (“HCHK Property”), Lexington Property and Staffing, Inc. (“Lexington Property,” and, together with HCHK Technologies and HCHK Property, the “HCHK Entities”), Brian Hofmeister, in his capacity as assignee of the HCHK Entities (the “Assignee”), and certain other parties, seeking determinations that, among other things, (a) the HCHK Entities are *alter egos* of the Individual Debtor and (b) the Individual Debtor is the equitable owner of the HCHK Entities and/or their assets.
 - The Trustee obtained Court approval of a settlement agreement (the “Assignee Settlement”) between the Trustee and the Assignee pursuant to Bankruptcy Rule 9019. The Assignee Settlement provides for important benefits to the estate, including the **deposit of over \$38 million of the HCHK Entities’ funds into accounts controlled by the Trustee and the Assignee’s commitment to not oppose the relief sought by the Trustee in the HCHK Litigation.**
 - The Trustee also prepared his motion for entry of a **default judgment against certain defendants, which the Court granted on September 29, 2023.**
- On July 11, 2023, the Trustee commenced an adversary proceeding against Scott Barnett (the Individual Debtor’s driver and/or bodyguard), Taurus Fund, LLC, and Taurus Management LLC, seeking determinations that, among other things, (a) the Individual Debtor is the equitable owner of a 50,000 square foot, castle-styled private residence with 12.5-acre grounds located at 675 Ramapo Valley Road, Mahwah, New Jersey 07430 (the “Mahwah Mansion”), (b) the Debtor is the equitable owner of Taurus Fund, LLC (the entity holding title to the Mahwah Mansion), and (c) that Taurus Fund is an *alter ego* of the Individual Debtor.
 - Among other things, the Trustee obtained a **preliminary injunction to protect the Mahwah Mansion.** (The mansion was, and to the Trustee’s knowledge, remains uninsured.)
 - The Trustee reached a **settlement with the U.S. Department of Justice** (the “Government”) to resolve certain potentially complex issues raised by the interplay of this adversary proceeding and the Government’s ongoing criminal case against the Debtor currently being heard before the United States District Court for the

Southern District of New York [Case No. 23 Cr. 118 (AT)] (the “Criminal Case”). Among other things, the settlement will ensure that any proceeds from an eventual sale of the Mahwah Mansion by the Trustee (if the Trustee prevails in this adversary proceeding) are used first to pay the estate’s expenses (including reasonable legal fees related to this adversary proceeding) in connection with taking control of and selling the Mahwah Mansion.

- On July 25, 2023, the Trustee commenced an adversary proceeding against Golden Spring (New York) Ltd. (“Golden Spring”) and China Golden Spring Group (Hong Kong) Limited (“China Golden Spring”), seeking determinations that, among other things, (a) Golden Spring is the *alter ego* of the Individual Debtor and (b) the Individual Debtor is the equitable owner of Golden Spring and/or its assets (notwithstanding China Golden Spring’s purported ownership interest in Golden Spring).
 - Golden Spring failed to respond to the complaint, and, on September 12, 2023, the Trustee requested entry of a default judgment as against Golden Spring. **The Court entered a default judgment against Golden Spring by order dated September 20, 2023.**⁴
- During the Fee Period, the Trustee continued to prosecute his adversary proceeding against Greenwich Land LLC (“Greenwich Land”) and the Individual Debtor’s alleged wife (*i.e.*, Hing Chi Ngok), seeking determinations that, among other things, (a) Greenwich Land (which holds legal title to the Individual Debtor’s residence in Greenwich, Connecticut) is an *alter ego* of the Debtor and (b) the Debtor is the equitable owner of Greenwich Land.
 - Following discovery in this adversary proceeding (including document discovery and depositions), the Trustee moved, on October 10, 2023, for summary judgment.
- During the Fee Period, the Trustee also continued to prosecute his adversary proceeding against Mei Guo, seeking determinations that, among other things, (a) the proceeds, likely in an amount of over \$10 million, from the sale of the Individual Debtor’s private Bombardier jet are property of the estate and (b) a series of BVI registered shell companies purportedly held by Mei Guo are property of the Individual Debtor’s chapter 11 estate.

⁴ On October 11, 2023, the Trustee also requested entry of a default judgment against China Golden Spring, which also failed to respond to the complaint. As of the filing of this Application, the Court has not yet ruled on that request.

3. Furthermore, during the Fee Period, the damage caused by the fire that occurred on March 15, 2023 at the Sherry Netherland Apartment continued to require the Trustee's and Paul Hastings' attention. Of particular note, during the Fee Period, Genever (US) filed its motion to (a) retain an architect, (b) authorize Genever (US) to select and hire contractors, engineers, consultants, and other third-party service providers in the ordinary course of the remediation project (including as it relates to the removal of asbestos), and (c) pay such contractors, engineers, consultants, and other third-party service providers in the ordinary course of the remediation project (including as it relates to the removal of asbestos). The Court granted the motion on September 19, 2023.

4. Concurrently with the remediation motion, the Trustee and the Genever Debtors also sought approval of interdebtor DIP financing to be provided by the Individual Debtor's estate to the Genever Debtors. As detailed in the DIP financing motion, the Genever Debtors have no cash and no source of income, and, without access to some source of liquidity, the Genever Debtors would not be able to make essential remediation repairs to the Sherry Netherland Apartment, pay current professional fees—including the costs of pursuing the AIG litigation—or even pay the statutory amounts to the U.S. Trustee, and would be forced to convert to a chapter 7 liquidation. For these reasons, the Trustee determined that the estate of the Individual Debtor would provide up to \$2,000,000 of critically necessary funding to the Genever Debtors so that they can fund their chapter 11 cases, including value-maximizing strategy for the sale of the Sherry Netherland Apartment. On September 12, 2023, the Court granted the motion.

5. All the while, during the Fee Period, the Trustee and Paul Hastings provided a wide range of other chapter 11 related services, including, for example, handling five hearings

and status conferences during the Fee Period, preparing and prosecuting numerous substantive motions and preparing monthly operating reports.

6. While the Trustee has made substantial headway in these chapter 11 cases, progress continues to be slowed by the unprecedented level of obstructionism and interference, both inside and outside the courtroom, from the Individual Debtor and his associates at every turn. This is most obvious in the Trustee's Rule 2004 investigation, where the Individual Debtor and his affiliates have continued their campaign to delay or not comply with discovery requests. And, most recently, on August 30, 2023, the Individual Debtor filed a motion (joined by Yvette Wang) in the Criminal Case seeking to stay these chapter 11 cases, pending resolution of his criminal trial.⁵ Other discovery targets related to the Individual Debtor also failed to comply with the Trustee's Rule 2004 subpoenas, necessitating substantial motion practice, including with respect to G-Club Operations LLC ("G-Club Operations") and Hudson Diamond NY LLC and Hudson Diamond Holding LLC (together with Hudson Diamond NY LLC, the "Hudson Entities").

7. While the Court granted substantially all of the relief requested by the Trustee (and denied substantially all of the relief requested by the Individual Debtor and his associates), the Trustee necessarily expended substantial time and resources on these matters, including because the Individual Debtor and his associates actively opposed the relief sought by the Trustee. Although it is extremely difficult to determine with precision the cost of the Individual Debtor's tactics, the Trustee continues to believe that a substantial portion of the fees generated during the Fee Period were the result of the Individual Debtor's or his affiliates' continuing non-

⁵ In response, Paul Hastings prepared the Trustee's emergency motion, filed on September 1, 2023 [Docket No. 2160], seeking to enjoin the Individual Debtor's stay motion on the basis that such motion violated the automatic stay in these chapter 11 cases. The Trustee and the Genever Debtors also filed a response in the Criminal Case, objecting to the imposition of a stay of these chapter 11 cases.

compliance with the Bankruptcy Code and/or active opposition or interference with the Trustee's administration of these chapter 11 cases.

8. As detailed in this Application, Paul Hastings has performed all of its services in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved. The work performed by Paul Hastings was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Whenever possible, Paul Hastings sought to minimize the costs of Paul Hastings' services by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. Moreover, as detailed below, Paul Hastings has delegated numerous work streams to local Connecticut counsel (which has a lower rate structure than Paul Hastings).

9. To further minimize the costs of intra-Paul Hastings communications and education about these chapter 11 cases, the Trustee utilized a small group of Paul Hastings attorneys for the majority of the work in these chapter 11 cases. Also, as a general matter, in addition to the Trustee, no more than two Paul Hastings attorneys attended the various hearings held during the Fee Period (and in some instances, the Trustee handled hearings without attendance of any Paul Hastings attorneys), thereby minimizing not only the time billed on these hearings/sessions but also the cost of travel. Furthermore, to the extent appropriate, the Trustee and Paul Hastings sought to work closely with counsel to Pacific Alliance Asia Opportunity Fund L.P. ("PAX"), including to take advantage of the knowledge of the Individual Debtor's assets and financial affairs that PAX acquired during the prepetition litigation against the Individual Debtor in New York state court (the "PAX Litigation"). Moreover, as noted on the record at the August 2, 2022 hearing on Paul Hastings' retention application, the Trustee has

agreed **not** to seek a percentage recovery under section 326 of the Bankruptcy Code, and, instead, agreed that he would only be compensated (at his standard hourly rate) for his time.

10. Finally, as an accommodation to these estates and to minimize the review process by the Court and parties in interest, Paul Hastings is not seeking allowance or payment at this time for the fees of twenty one (21) timekeepers who billed less than five (5) hours during the Fee Period in the aggregate amount of \$37,232.00. The time billed by these timekeepers was reasonable, and Paul Hastings reserves the right to seek allowance of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance of Paul Hastings' fees and expenses.

11. In sum, Paul Hastings respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to these chapter 11 estates and their stakeholders. Accordingly, in light of the nature and complexity of these chapter 11 cases, Paul Hastings' charges for professional services performed and expenses incurred are reasonable under applicable standards. For all these reasons, Paul Hastings respectfully requests that the Court grant the Application and allow interim compensation for professional services performed and reimbursement for expenses as requested.

JURISDICTION, VENUE, BASES FOR RELIEF, AND COMPLIANCE

12. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference* from the United States District Court for the District of Connecticut (as amended). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

13. The legal predicates for the relief requested herein are sections 328, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

14. Paul Hastings believes that this Application, together with the attachments hereto, substantially complies with the Bankruptcy Rules, Local Rule 2016-1, the Interim Compensation Procedures Order, and the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the "U.S. Trustee Guidelines").⁶ Paul Hastings respectfully requests a waiver of any of the foregoing requirements not met by this Application.

15. Attached and incorporated herein by reference are the following Exhibits:

- Exhibit A contains disclosures regarding "customary and comparable compensation."
- Exhibit B1 contains a summary of Paul Hastings' timekeepers included in this Application.
- Exhibit B2 contains a summary of Paul Hastings' timekeepers who billed less than five (5) hours during the Fee Period and for whom Paul Hastings is not seeking allowance or payment at this time.
- Exhibit C contains a summary of the compensation requested by project category.
- Exhibit D contains a summary of the compensation requested by Matter ID.
- Exhibit E contains the expense reimbursements requested by category.
- Exhibit F contains the monthly statements of Paul Hastings detailing the services performed and itemizing the expenses incurred during the Fee Period.
- Exhibit G contains the Proposed Order.

BACKGROUND

I. Individual Debtor's Chapter 11 Case

16. On February 15, 2022 (the "Petition Date"), the Individual Debtor filed with the Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

⁶ Paul Hastings reserves all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in these chapter 11 cases.

17. On March 21, 2022, the United States Trustee appointed an Official Committee of Unsecured Creditors (“Committee”) in the Individual Debtor’s chapter 11 case. No examiner has been appointed in the Individual Debtor’s chapter 11 case.

18. On June 15, 2022, the Court entered a memorandum of decision and order [Docket No. 465] (the “Trustee Order”) directing the United States Trustee to appoint a chapter 11 trustee in the chapter 11 case of Ho Wan Kwok. Pursuant to the Trustee Order, the United States Trustee selected Luc A. Despins as the Trustee. On July 8, 2022, the Court entered an order granting the appointment of Luc A. Despins as the Trustee in the chapter 11 case of Ho Wan Kwok.

19. The Court authorized Paul Hastings’ retention as attorneys for the Trustee pursuant to the *Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Counsel to Chapter 11 Trustee, effective as of July 8, 2022* [Docket No. 668] (together with the retention order with respect to the Genever Debtors [Docket No. 1376], the “Retention Order”), entered on August 2, 2022. The Retention Order authorizes Paul Hastings to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 328 and 330 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct. Moreover, at the August 1, 2022 hearing on the Paul Hastings’ retention application, the Court made clear that it approved Paul Hastings’ New York rate structure.⁷ In addition, as noted on the record at that hearing, the Trustee has agreed *not* to seek a percentage recovery under section 326 of the Bankruptcy Code, and, instead, agreed that he would only be compensated (at his standard hourly rate) for his time.

⁷ See Aug. 1, 2022 H’rg Tr. at 113:15-19 (“MR. DESPINS: But I want to be clear is that that’s not going to be a back door way to bring local rates, or anything like that -- THE COURT: No, I’m not doing that. I agree with that.”)

20. In light of the Trustee's ongoing investigation into the Individual Debtor's assets and his financial affairs, the Trustee is unable at this time to predict when he will be in a position to file a plan and disclosure statement. All quarterly fees have been paid to the United States Trustee, and all monthly operating reports have been filed through August 2023 (for the Individual Debtor's chapter 11 case), July 2023 (for Genver (BVI)'s chapter 11 case), and June 2023 (for Genever (US)'s chapter 11 case).

21. At this time, the amount of cash in the Trustee's account is approximately \$75 million.⁸ The Trustee is not aware of any material administrative expense claims other than claims for professional fees and expenses.

II. Genver (BVI)'s Chapter 11 Case

22. On October 11, 2022, Genever (BVI)—an entity wholly owned by the Individual Debtor—filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

23. No trustee or official committee of unsecured creditors has been appointed in Genever (BVI)'s chapter 11 case.

24. October 14, 2022, the Court entered an order granting joint administration of the Individual Debtor's chapter 11 case and Genever (BVI)'s chapter 11 case [Docket No. 970].

25. On January 24, 2023, the Court granted Genever (BVI)'s application to retain Paul Hastings as counsel to Genever (BVI) in its chapter 11 case, effective as of its petition date, *i.e.*, October 11, 2022 [Docket No. 1376].

⁸ This amount includes approximately \$38.8 million in funds received and held by the Trustee pursuant to the settlement with the Assignee in the HCHK Adversary Proceeding (as defined below).

III. Genever (US)'s Chapter 11 Case

26. On October 12, 2020, Genever Holdings LLC—an entity wholly owned by Genever (BVI)—filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the “SDNY Bankruptcy Court”), thereby commencing case number 20-12411 (JLG) (the “SDNY Bankruptcy Case”).

27. On November 3, 2022, the SDNY Bankruptcy Court entered an order [Docket No. 225 in Case No. 22-50592] transferring the venue of the SDNY Bankruptcy Case to this Court, which assigned it Case Number 22-50592.

28. On November 21, 2022, the Court entered an order granting joint administration of the Genever (US) Debtor’s chapter 11 case with the jointly administered cases of the Individual Debtor and the Genever (BVI) Debtor’s chapter 11 case [Docket No. 1141].

29. On January 24, 2023, the Court granted Genever (US)’s application to retain Paul Hastings as counsel to Genever (US) in its chapter 11 case, effective as of the order transferring venue of the SDNY Bankruptcy Case to this Court, *i.e.*, November 3, 2022 [Docket No. 1376].

RELIEF REQUESTED

30. By this Application, the Trustee and Paul Hastings request allowance of fees (in the amount of \$2,980,787.40) and expenses incurred (in the amount of \$146,137.57) for services rendered by, for, and on behalf of the Trustee during the Fee Period.⁹ The Trustee has approved the amounts requested by Paul Hastings herein.

⁹ As an accommodation to these estates and to minimize the review process by the Court and parties in interest, Paul Hastings is not seeking allowance or payment at this time for the fees of twenty one (21) timekeepers who billed less than five (5) hours during the Fee Period in the aggregate amount of \$37,232.00. The time billed by these timekeepers was reasonable, and Paul Hastings reserves the right to seek allowance of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance of Paul Hastings’ fees and expenses.

31. While this Application seeks allowance of all fees incurred during the Fee Period, Paul Hastings does **not** seek, at this time, payment of the 20% holdback withheld by the Debtors' estates with respect to Fee Period. Moreover, as noted, Paul Hastings has not been paid with respect to its monthly fee statement for the month of August 2023 (and does not seek payment of such fees at this time). That said, and for the avoidance of doubt, 80% of the fees for the month of August and all such expenses may be paid, at a future date, in accordance with the Interim Compensation Procedures Order.

COMPENSATION AND VALUE OF SERVICES

32. To date, the Trustee and Paul Hastings have submitted the following fee/expense-related applications in these chapter 11 cases:

- (a) On March 1, 2023, Paul Hastings submitted the *First Interim Application of Chapter 11 Trustee and his Counsel, Paul Hastings LLP, for Reimbursement of Expenses for the Period from July 8, 2022 through October 31, 2022* [Docket No. 1495] (the "Expense Reimbursement Application"), whereby the Trustee and Paul Hastings requested reimbursement of the actual and necessary expenses incurred by the Trustee and Paul Hastings during the period from July 8, 2022 through October 31, 2022 in the amount of \$63,631.75. On May 3, 2023, the Court entered an order granting the Expense Reimbursement Application [Docket No. 1747] (the "Expense Reimbursement Order"). The Individual Debtor's estate paid the foregoing amount on May 8, 2023.
- (b) On April 10, 2023, Paul Hastings submitted the *Special Fee Application of Chapter 11 Trustee and his Counsel, Paul Hastings LLP, for Services Rendered in Securing Compliance with Court-Authorized Subpoenas* [Docket No. 1648] (the "Special Fee Application"). In the Special Fee Application, Paul Hastings requested allowance and payment of fees in the amount of \$83,370.26 in accordance with the HK Parties Contempt Order.¹⁰ On April 21, 2023, the Court approved

¹⁰ On March 10, 2023, the Court entered the *Order Holding HK Parties in Contempt of Court and Sanctioning HK Parties, Attorney Vartan and Chiesa Shahinian & Giantomasi PC* [Docket No. 1537] (the "HK Parties Contempt Order"), pursuant to which the Court ordered Ms. Mei Guo, HK USA, attorney Lee Vartan, and Chiesa Shahinian & Giantomasi PC (collectively, the "HK Parties"), jointly and severally, to compensate the Trustee and his counsel, Paul Hastings, for reasonable attorneys' fees and expenses associated with the Trustee's efforts to secure compliance with certain Court-authorized subpoenas.

the Special Fee Application and ordered the HK Parties to remit payment of \$83,370.26 to the chapter 11 estate of the Individual Debtor [Docket No. 1693] (the “HK Parties Sanctions Order”). As of the filing of this Application, the HK Parties have not remitted payment.

- (c) On May 30, 2023, Paul Hastings submitted the *Interim Fee Application of Paul Hastings LLP for Compensation and Reimbursement of Expenses for the Period from July 8, 2022 through February 28, 2023* [Docket No. 1831] (the “First Interim Fee Application”) seeking \$12,326,802.00 in fees and \$348,813.54 for reimbursement of expenses. The First Interim Fee Application excluded the expense reimbursements approved in the Expense Reimbursement Order. The First Interim Fee Application included the amount requested in the Special Fee Application (for the period through February 28, 2023). However, to the extent the Trustee is able to recover the fees under the HK Parties Sanctions Order from the HK Parties, Paul Hastings will not seek payment of such fees from these estates.¹¹ Pursuant to agreement with the U.S. Trustee, Paul Hastings reduced its fee request by \$550,000. On June 29, 2023, the Court approved the First Interim Fee Application [Docket No. 1964] with such reduction. Paul Hastings has received payment of \$11,776,802.00 in fees and \$348,813.54 in expenses in connection with the First Interim Fee Application.
- (d) On August 4, 2023, Paul Hastings submitted the *Second Interim Fee Application of Paul Hastings LLP for Compensation and Reimbursement of Expenses for the Period from March 1, 2023 through June 30, 2023* [Docket No. 2051] (the “Second Interim Fee Application”) seeking \$8,037,720.00 in fees and \$213,914.83 for reimbursement of expenses. The Second Interim Fee Application included the amount requested in the Special Fee Application (for the period from March 1, 2023 through March 10, 2023). However, to the extent the Trustee is able to recover the fees under the HK Parties Sanctions Order from the HK Parties, Paul Hastings will not seek payment of such fees from these estates. Pursuant to agreement with the U.S. Trustee, Paul Hastings reduced its fee request by \$55,000.00. On September 12, 2023, the Court approved the Second Interim Fee Application [Docket No. 2190] with such reduction. Paul Hastings has received payment of \$6,386,176.00 in fees (or 80% of the allowed fees

¹¹ At this time, the HK Parties have not paid the amounts due under the HK Parties Sanctions Order (even though such amounts were due on May 5, 2023). Indeed, the HK Parties have (unsuccessfully) sought reconsideration of the HK Parties Sanctions Order [Docket Nos. 1730 and 1733] and, thereafter, appealed both the HK Parties Sanctions Order and the order denying reconsideration [Docket No. 1750], as well as sought a stay pending appeal [Docket No. 1770]. That request for a stay was denied by order dated May 15, 2023 [Docket No. 1791]. That said, the Trustee agreed not to seek to enforce the Sanctions Order pending the District Court’s decision on the appeal.

in the amount of \$7,982,720) and \$213,914.83 in expenses in connection with the Second Interim Fee Application.

- (e) In September 2023, pursuant to the Interim Compensation Procedures Order, Paul Hastings submitted monthly fee statements for services rendered during the Fee Period. *See* Docket Nos. 2180 and 2228 for July 2023 services and Docket Nos. 2218 and 2228 for August 2023 services. Paul Hastings requested (i) for July 2023 services, fees in the amount of \$1,389,424.80 (*i.e.*, 80% of \$1,736,781.00 in fees incurred) and \$116,812.50 in expenses and (ii) for August 2023 services, fees in the amount of \$1,621,148.20 (*i.e.*, 80% of \$2,026,435.25 in fees incurred) and \$29,325.07 in expenses. Paul Hastings has received payment in the amount of \$1,389,424.80 with respect to its July 2023 services. As noted, Paul Hastings has not received payment with respect to its August 2023 services.

33. Except as set forth above, neither the Trustee nor Paul Hastings has received any payment or promise of payment from any source for services rendered during the Fee Period. There is no agreement or understanding between the Trustee and/or Paul Hastings and any other person other than the attorneys, employees, and staff of Paul Hastings, for the sharing of compensation to be received for services rendered in these chapter 11 cases.

34. Paul Hastings' professional services during the Fee Period required an aggregate expenditure of 3,031.60 recorded hours by attorneys and paraprofessionals, broken down as follows: partners (499.40 hours), of counsel (584.80 hours), associates (1,670.20 hours), and paraprofessionals (277.20 hours). The timekeepers who rendered such services are identified in the Cover Sheet hereto, along with the number of hours and the total compensation sought for each individual.

35. Paul Hastings maintains computerized records, in the form of monthly statements, of the time spent by all Paul Hastings' attorneys and paraprofessionals in connection with its representation of the Trustee and the Genever Debtors. With the exception of the monthly

statements submitted with the Special Fee Application,¹² the monthly statements are in the same form regularly used by Paul Hastings to bill its clients for services rendered and include the date that the services were rendered, a detailed, contemporaneous narrative description of the services provided, the amount of time spent for each service, and the designation of the professional who performed the service. Attached hereto as Exhibit F are true and correct copies of the monthly statements of Paul Hastings related to the fees requested herein.

36. As a courtesy to these estates and based on circumstances unique to these chapter 11 cases, Paul Hastings did not implement the August 1, 2023 firm-wide hourly rate increase in these chapter 11 cases and, instead, maintained the existing rates for the Fee Period.¹³ In addition, Paul Hastings agreed on a reduced hourly rate for Luc Despins (from his standard hourly rate of \$1,975 to the reduced hourly rate of \$1,860) for the Fee Period.¹⁴ Other than these hourly rate discounts, the rates Paul Hastings charges for the services rendered by its professionals and paraprofessionals in these chapter 11 cases are comparable to the rates Paul Hastings charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. In addition, when Paul Hastings' restructuring professionals and paraprofessionals work on non-bankruptcy matters, the firm generally charges their standard rate. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

37. Paul Hastings respectfully submits that the reasonable value of the services rendered by Paul Hastings (including the Trustee) during the Fee Period is \$3,725,984.25.

¹² As noted in the Special Fee Application, Paul Hastings' monthly statements for fees incurred in securing compliance with the Court-authorized subpoenas are limited to those services and, thus, vary in form from that regularly used by Paul Hastings to bill its clients for services rendered.

¹³ This translates into a voluntary waiver of \$62,236.50 in fees.

¹⁴ This translates into a voluntary waiver of \$25,351.75 in fees.

SUMMARY OF SERVICES

38. During the Fee Period, Paul Hastings assisted and advised the Trustee and the Genever Debtors on a regular basis regarding legal matters relating to these chapter 11 cases and the pursuit and recovery of estate assets for the benefit of the chapter 11 estates and their creditors. In addition, Paul Hastings prepared various motions, applications, proposed orders, and other pleadings submitted to the Court for consideration, and performed the necessary professional services that are described below and in the fee statements attached hereto and incorporated herein by reference.¹⁵

39. For ease of reference and transparency purposes, and at the request of the U.S. Trustee, Paul Hastings created the following separate Matter IDs for services in these chapter 11 cases, including separate Matter IDs for the major adversary proceedings pending in these chapter 11 cases.¹⁶

Matter ID	Matter Name
00001	General Chapter 11 Trustee Representation
00002	Asset Recovery Investigation and Litigation
00003	Other Litigation
00004	Corporate Law Issues
00005	Sale Process
00006	Tax Issues
00007	Foreign Law Issues
00008	Plan Process Issues
00009	Chapter 11 Trustee Tasks ¹⁷
00010	Genever US
00011	Genever BVI
00012	Mahwah Adversary
00013	Golden Spring Adversary
00014	HCHK Adversary
00015	Interpleader Adversary

¹⁵ The description of services in this Application is limited to those matters in which Paul Hastings provided five (5) or more hours of service during the Fee Period.

¹⁶ These new Matter IDs (*i.e.*, 00012 through 00022) were established effective as of March 1, 2023.

¹⁷ Not included as part of this Application.

Matter ID	Matter Name
00016	Mei Guo Adversary
00017	HK USA Adversary
00018	Bravo Luck Adversary
00019	SN Apartment Adversary
00020	Greenwich Land Adversary
00021	AIG Adversary ¹⁸
00022	PAX Adversary

40. Additionally, the Trustee and the Genever Debtors retained Neubert Pepe & Monteith, P.C. (“NPM”) as their local and conflicts counsel in order to provide services to the Trustee and the Genever Debtor’s estates in a cost-effective manner. In particular, as detailed in the NPM retention application and related declarations, Paul Hastings and NPM have coordinated, and will continue to coordinate, each firm’s respective responsibilities in connection with the representation of the Trustee and the Genever Debtors. Among other things, during the Fee Period, the following matters were delegated to NPM:

- Assisting with filings and service of pleadings in the main chapter 11 case and related adversary proceedings;
- Preparing supplemental motions for discovery under Bankruptcy Rule 2004 (including for discovery targets for which Paul Hastings is conflicted), conducting meet and confers with discovery targets, and reviewing documents produced in response to Rule 2004 subpoenas;
- Assisting the Trustee on matters on which Paul Hastings is conflicted;
- Preparing certain procedural motions, including motion to seal, motions to expedite, and motions to adjourn;
- Advising the Trustee and the Genever Debtors on matters related to local Connecticut rules;
- Preparing monthly operating reports for the Genever Debtors; and
- Performing a variety of case administration functions, including interacting with the Court and the clerks’ office as needed, preparing

¹⁸ Not included as part of this Application.

certificates of service, coordinating logistics for hearings, and handling other case administration functions as they arise from time to time.

41. In addition, Paul Hastings has recently also delegated a number of important matters (including entire adversary proceedings) related to the Trustee's investigation and efforts to recover assets for the benefit of these estates.

I. General Chapter 11 Trustee Representation (Matter ID 00001)

A. Case Administration (Task Code B110)
Fees: \$73,188.50 Total Hours: 80.80

42. During the Fee Period, Paul Hastings attorneys handled numerous case administrative matters in connection with these chapter 11 cases, including (a) developing short-term and long-term strategies for recovering assets for the benefit of these estates, (b) maintaining a case calendar and task lists of open matters and work streams, (c) handling various logistical matters (including as it relates to the Trustee's bank accounts), (d) handling numerous calls and correspondence with the U.S. Trustee and PAX regarding the background to, and the administration of, these chapter 11 cases, and (e) holding internal team meetings and calls to coordinate work streams.

B. Pleadings Review (Task Code B113)
Fees: \$47,416.50 Total Hours: 86.00

43. During the Fee Period, Paul Hastings attorneys reviewed and monitored the docket of these chapter 11 cases, the related adversary proceedings, and pending state court litigation, as well as reviewed pleadings filed therein, as necessary.

C. Court Hearings (Task Code B155)
Fees: \$16,528.50 Total Hours: 28.80

44. During the Fee Period, Paul Hastings attorneys prepared for and attended numerous hearings and status conferences. As detailed below, most of the hearings were recorded under the applicable Matter ID. That said, general hearing preparation (including

agendas) for the hearings scheduled on July 11, 2023, July 18, 2023, August 15, 2023, August 22, 2023, and August 29, 2023 was recorded under Matter ID 00001.

D. Fee / Employment Applications for Paul Hastings (Task Code B160)
Fees: \$148,148.50 Total Hours: 103.60

45. During the Fee Period, in connection with Paul Hastings' retention, Paul Hastings attorneys prepared a supplemental declaration with respect to the Trustee's and Paul Hastings' disinterestedness [Docket No. 2204] and conducted related research to identify possible connections between the Trustee and Paul Hastings, on the one hand, and parties in interest in these chapter 11 cases, on the other hand. In addition, Paul Hastings attorneys assisted NPM in preparing (a) the *Motion of Chapter 11 Trustee and Genever Debtors for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 2002] (which the Court granted on August 18, 2023 [Docket No. 2094]), (b) the Second Interim Fee Application [Docket No. 2051] (which the Court granted on September 12, 2023 [Docket No. 2190]), (c) Paul Hastings' monthly fee statements for services rendered in March, April, May, June, and July 2023, and (d) portions of this Application. Paul Hastings also corresponded and engaged in discussions with the U.S. Trustee to address questions regarding the above fee and expense reimbursement requests. Among other things, Paul Hastings consensually resolved the U.S. Trustee's informal comments to the Second Interim Fee Application.

E. Fee / Employment Applications for Other Professionals (Task Code B165)
Fees: \$56,220.00 Total Hours: 36.60

46. During the Fee Period, Paul Hastings attorneys interviewed potential candidates to serve as forensic accountants and, upon the Trustee's selection of Kroll, LLC ("Kroll") as forensic accountant, assisted Kroll in the preparation of its application to be retained by the

Trustee as forensic accountant [Docket No. 2162] (which application was granted by order, dated September 29, 2023 [Docket No. 2241]). Paul Hastings attorneys also assisted various other estate professionals in connection with their retention applications, including the application to retain Bohannon Law Firm, LLC, as special maritime counsel in connection with the sale(s) of the Lady May and Lady May II [Docket No. 2025] (which application was granted by order, dated August 18, 2023 [Docket Nos. 2095]).

47. In addition, during the Fee Period, Paul Hastings attorneys handled various other fee-related issues, including (a) assisting Epiq Corporate Restructuring, LLC (“Epiq”) with its interim fee application, (b) assisting Engineering Operations and Certification Services, LLC (“EOCS”) with respect to its invoice related to the transition of ownership of the Lady May to the Trustee, and (c) assisting Harney Westwood and Riegels LP (“Harney Legal”) and Pallas Partner LLP (“Pallas”) with their monthly fee statements.

F. Business Operations (Task Code B210)
Fees: \$16,946.00 Total Hours: 12.70

48. During the Fee Period, Paul Hastings attorneys assisted the Trustee with various matters related to the operation of these chapter 11 estates, including handling wire transfers and obtaining an updated trustee bond.

G. Financial Reports (Monthly Operating Reports) (Task Code B211)
Fees: \$9,267.00 Total Hours: 8.00

49. During the Fee Period, Paul Hastings attorneys prepared the monthly operating reports in the Individual Debtor’s chapter 11 case. In the interest of minimizing costs, the monthly operating reports for the Genever Debtors were prepared by NPM, and any time spent by Paul Hastings attorneys reviewing and commenting such reports was recorded under Matter ID 00010 (for Genever (US)) and 00011 (for Genever (BVI)).

H. Financing/Cash Collections (Task Code B230)
Fees: \$225,833.00 Total Hours: 174.00

50. During the Fee Period, Paul Hastings attorneys prepared the Trustee and the Genever Debtors' motion seeking approval of interdebtor DIP financing to be provided by the Individual Debtor's estate to the Genever Debtors [Docket No. 2110], including the related DIP financing agreement. As detailed in the DIP financing motion, the Genever Debtors are in a precarious position in their chapter 11 cases. The current condition of the Sherry Netherland Apartment is such that it is uncertain if, and when, Genever (US) will be able to rent or sell the property. And while Genever (US) believes it will prevail in its litigation against AIG regarding the insurance coverage with respect to the Sherry Netherland Apartment, the outcome of that litigation is also uncertain. At the same time, the Genever Debtors have no cash and no source of income. Without access to some source of liquidity, the Genever Debtors would not be able to make essential remediation repairs to the Sherry Netherland Apartment, pay current professional fees—including the costs of pursuing the AIG litigation—or even pay the statutory amounts to the U.S. Trustee, and would be forced to convert to a chapter 7 liquidation. For these reasons, the Trustee determined that the estate of the Individual Debtor would provide up to \$2,000,000 of critically necessary funding to the Genever Debtors so that they can fund their chapter 11 cases while they pursue a chapter 11 process—including pursuing the AIG litigation and a value-maximizing strategy for the sale of the Sherry Netherland Apartment.

51. Before filing the DIP financing motion, the Trustee and Paul Hastings engaged in discussions with the Sherry Netherland and the U.S. Trustee and resolved their concerns with respect to the DIP financing motion. As a result, no objections were filed to the DIP financing motion, and, on September 12, 2023, the Court entered an order granting the motion [Docket No. 2193].

II. Asset Recovery Investigation and Litigation (Matter ID 00002)¹⁹

I. Court Hearings (Task Code B155)

Fees: \$33,105.00 Total Hours: 29.10

52. During the Fee Period, Paul Hastings attorneys attended numerous hearings related to the Trustee's investigation and related litigation, including:

- the July 11, 2023 hearing on, among other things, (a) the Trustee's motion to compel compliance with Rule 2004 subpoenas as it pertains to certain Hudson Diamond entities, (b) Zeisler & Zeisler's motion to withdraw as counsel to Hudson Diamond NY LLC, and (c) Genever (US)'s application to retain Affiliated Adjustment Group, Ltd. ("AAGL"), as public adjuster.
- the July 18, 2023 hearing on, among other things, the Trustee's omnibus motion to compel compliance with Rule 2004 subpoenas as it pertains to GTV Media, Inc., Saraca Media Group, Inc. and attorney Aaron D. Mitchell; and
- the August 22, 2023 hearing on the Trustee's omnibus motion to compel compliance with Rule 2004 subpoenas as it pertains to certain Hudson Diamond entities.

53. In addition, general hearing preparation (including agendas) for the hearings scheduled on July 11, 2023, July 18, 2023, August 15, 2023, August 22, 2023, and August 29, 2023 was also recorded under Matter ID 00002.

J. General Litigation (Task Code B191)

Fees: \$43,667.50 Total Hours: 36.70

54. During the Fee Period, Paul Hastings attorneys worked on several litigation matters not related to a specific adversary proceeding,²⁰ including (i) holding several internal

¹⁹ As part of the consensual resolution of the U.S. Trustee's informal comments to Paul Hastings' First Interim Fee Application, Paul Hastings agreed that, effective March 1, 2023, time spent on the key adversary proceedings in these chapter 11 cases would be recorded under separate matter numbers, namely Matter IDs 00012 to 00022 (as opposed to Matter ID 00002). Only litigation work not related to specific adversary proceedings continues to be recorded under Matter ID 00002, Task Code B191 (General Litigation). This change does not affect the other work streams recorded under Matter ID 00002.

²⁰ As noted, effective as of March 1, 2023, Paul Hastings has recorded time spent on the key adversary proceedings in these chapter 11 cases under separate matter numbers, as detailed below.

calls to discuss general litigation strategy and next steps, (ii) maintaining a task list with respect to pending adversary proceedings, (iii) maintaining a tracking chart with respect to the pending appeals in these cases, and (iv) generally reviewing and analyzing pleadings filed in adversary proceedings.

K. Non-Working Travel (Task Code B195) [billed at ½ rate]
Fees: \$7,438.75 Total Hours: 10.90

55. During the Fee Period, Paul Hastings attorneys traveled to (a) the Federal Courthouse in Bridgeport, Connecticut, for various hearings and (b) Connecticut to conduct depositions in connection with the Trustee's Rule 2004 investigation.

L. Investigations (Task Code B261)
Fees: \$542,440.50 Total Hours: 451.00

56. During the Fee Period, Paul Hastings attorneys continued to handle the Trustee's extensive investigation to identify potential assets of the Individual Debtor's estate. Given the corporate maze of shell companies set up by the Individual Debtor, including hundreds of companies purportedly owned by his close family members, business associates, and employees, this investigation has necessarily been extensive and time intensive.

57. As part of this investigation, Paul Hastings attorneys (a) analyzed documents produced in response to Rule 2004 subpoenas,²¹ (b) engaged in meet and confer sessions with the targets of the Rule 2004 discovery, (c) identified additional entities for further investigation, (d) interviewed potential forensic accountants, (e) conducted numerous calls and meetings with the forensic accountant (Kroll) to apprise them of the status of the Trustee's investigation, (f) analyzed various issues related to Zeisler & Zeisler's motion to withdraw as counsel to Hudson

²¹ As further detailed below, in the interest of minimizing costs, Paul Hastings utilized UnitedLex Corporation ("UnitedLex") to conduct, among other things, first-round review of documents produced in the Trustee's investigation. UnitedLex specializes in discovery services, including document processing, storage, review services, and distribution.

Diamond NY LLC, and (g) analyzed potential claims against the Individual Debtor and his affiliated entities (including potential claims under RICO). In addition, Paul Hastings attorneys prepared for and deposed (i) M. Levine of Elliot Kwok Levine & Jaroslaw LLP, which was counsel to Lamp Capital LLC between May 2022 and September 2022, and (ii) J. Siegal of Baker & Hostetler LLP, which was counsel to the Debtor between September 2020 and on or around February 2022.

58. Paul Hastings attorneys also continued to assist NPM in preparing supplemental motions under Bankruptcy Rule 2004 seeking discovery from various individuals and entities associated with the Individual Debtor, including the motion filed on August 11, 2023 [Docket No. 2079] and the related reply brief filed on August 25, 2023 [Docket No. 2145] in response to the objection filed by Greenwich Land, LLC (“Greenwich Land”) and Hing Chi Ngok [Docket No. 2098].²² The Court overruled the objection and granted the supplemental Rule 2004 motion by orders dated September 19, 2023 [Docket No. 2210]. In addition, on August 11, 2023, Paul Hastings filed the Trustee’s supplemental motion to hold GTV Media Group, Inc. and Saraca Media Group, Inc. in civil contempt for failing to respond to the Trustee’s Rule 2004 subpoenas [Docket No. 2080], which motion was granted by order dated August 18, 2023 [Docket No. 2093]. Furthermore, during the Fee Period, Paul Hastings attorneys communicated with confidential informants, who provided valuable insight into the Individual Debtor’s business operations.²³

²² The supplemental Rule 2004 motion was filed by NPM because Paul Hastings was conflicted as to some of the discovery targets. To the extent Paul Hastings did not have a conflict, it assisted NPM in preparing the supplemental motion.

²³ In light of the Individual Debtor’s well-documented social media campaign against the Trustee, Paul Hastings attorneys, and creditors in these chapter 11 cases, the time entries attached to this Application have been redacted to remove the names of these “tipsters.”

59. As noted in Paul Hastings' prior fee applications, much of the Trustee's investigation also required the expertise of Paul Hastings' Mandarin-speaking attorneys in order to analyze thousands Mandarin-language documents (including WhatsApp, text messages, and videos). This work required not only Mandarin language skills but an understanding of the legal significance of these documents, which an outside translation service would not be able to provide. Paul Hastings' Mandarin-speaking attorneys were also critical for the Trustee to communicate with the numerous Mandarin-speaking "informants" that have reached out to the Trustee during the course of these chapter 11 cases.

60. To date, the Trustee's investigation (including as a result of discovery under Rule 2004, information provided by confidential informants, and corporate documents received from BVI registered agents) uncovered numerous assets that the Trustee believes are property of the Individual Debtor's estate, which the Trustee is seeking to recover for the benefit of the estate. In fact, as detailed further below, during the Fee Period, the Trustee continued to prosecute several adversary proceedings to recover such assets.

61. Unfortunately, as the Court is well aware, the Trustee's investigation continued to face vigorous opposition, at every turn, not only from the Individual Debtor, but also many of the targets of the Trustee's investigation (*i.e.*, the Individual Debtor's close family members, business associates, and employees), necessitating significant motion practice to compel compliance (which compliance, to this day, remains forthcoming in many instances). For example, on July 26, 2023, the Court entered an order [Docket No. 2035] (the "Contempt Order") granting the Trustee's motion to hold the Individual Debtor in contempt for improperly

asserting his Fifth Amendment right against self-incrimination to refuse to produce documents to the Trustee.²⁴

M. Contempt Proceedings (Task Code B262)
Fees: \$7,897.50 Total Hours: 5.10

62. On March 10, 2023, the Court entered the HK Parties Contempt Order [Docket No. 1537] holding the HK Parties (*i.e.*, HK USA, Ms. Guo, and attorney Lee Vartan) in contempt and directing them, jointly and severally, to compensate the Trustee and his counsel, Paul Hastings, for reasonable attorneys' fees and expenses associated with the Trustee's efforts to secure compliance with the subpoenas. On April 10, 2023, the Trustee and Paul Hastings filed their Special Fee Application seeking payment of \$83,370.26 from the HK Parties with respect to fees incurred during the period from September 28, 2023 through March 10, 2023 (*i.e.*, the date the Court entered the HK Parties Contempt Order). The Court granted the Special Fee Application by order dated April 23, 2023 [Docket No. 1693], *i.e.*, the HK Parties Sanctions Order.

63. All of the fees covered by the Special Fee Application were incurred prior to the Fee Period (*i.e.*, prior to July 1, 2023).²⁵ However, Paul Hastings has continued to track time spent on these matters after March 10, 2023 under Task Code B262, which time principally relates to the HK Parties' appeal of the HK Parties Sanctions Order.²⁶ Among other things,

²⁴ As the Trustee advised the Court at the September 27, 2023 hearing that, at the request of the Government, the Trustee is presently not pursuing the documents at issue in the Contempt Order.

²⁵ As detailed in the Special Fee Application, the time spent on seeking to compel HK USA and Ms. Guo to comply with the Trustee's subpoenas was recorded under Task Code B262 (with a 50% reduction to reflect that some of that time also related to the enforcement of the subpoena issued to the Individual Debtor).

²⁶ Prior to the Fee Period, the HK Parties unsuccessfully sought reconsideration of the HK Parties Sanctions Order [Docket Nos. 1730 and 1733] and, thereafter, appealed both the HK Parties Sanctions Order and the order denying reconsideration [Docket No. 1750], as well as sought a stay pending appeal [Docket No. 1770]. That request for a stay was denied by order dated May 15, 2023 [Docket No. 1791]. That said, the Trustee agreed not to seek to enforce the Sanctions Order pending the District Court's decision on the appeal.

during the Fee Period, Paul Hastings attorneys prepared the Trustee's appellee brief in this appeal.

III. Other Litigation (Matter ID 00003)²⁷

N. General Litigation (Task Code B191)
Fees: \$53,166.00 Total Hours: 39.20

64. During the Fee Period, Paul Hastings attorneys assisted the Trustee on various litigation-related matters (other than the adversary proceedings pending in these chapter 11 cases). First, as the Court is well aware, on March 15, 2023, the Individual Debtor and Yvette Wang were arrested by federal law enforcement authorities. Paul Hastings monitored these criminal proceedings and reviewed pleadings filed in these proceedings.

65. Moreover, on August 30, 2023, the Individual Debtor filed a motion (joined by Yvette Wang) in the Criminal Case seeking to stay these chapter 11 cases, pending outcome of his criminal trial. In response, Paul Hastings prepared the Trustee's emergency motion, filed on September 1, 2023 [Docket No. 2160], seeking to enjoin the Individual Debtor's stay motion on the basis that such motion violated the automatic stay in these chapter 11 cases.²⁸

IV. Sale Process (Matter ID 00005)

A. Asset Disposition (Task Code B130)
Fees: \$10,150.50 Total Hours: 7.50

66. During the Fee Period, Paul Hastings attorneys and the Trustee, in close coordination with Edmiston, handled all aspects of the sale and marketing process for the Lady May II, as well as certain post-closing matters with respect to the sale of the Lady May (the sale

²⁷ As a general matter, time spent on litigation-related tasks other than adversary proceedings in these chapter 11 cases was tracked under Matter ID 00003.

²⁸ By order dated September 12, 2023 [Docket No. 2195], the Court denied the Trustee's related motion to expedite his emergency motion, noting that a hearing, if any, on the emergency motion would be scheduled after the district court presiding over the Criminal Case has acted on the Individual Debtor's stay motion.

of which closed on June 30, 2023, *i.e.*, immediately prior to the Fee Period). In addition, during the Fee Period, Paul Hastings began analyzing various issues related to the potential sale of furniture located at the Sherry Netherland Apartment.

V. Genever US (Matter ID 00010)

A. Sale of Real Estate (Task Code B131)
Fees: \$10,621.00 Total Hours: 8.20

67. During the Fee Period, Paul Hastings attorneys continued to analyze numerous issues related to the sale process for the Sherry Netherland Apartment. While the sale process was necessarily put on hold following the March 15, 2023 fire in order to assess the damage to the Sherry Netherland Apartment and evaluate the sale strategy going forward, Paul Hastings continued to analyze certain legal issues pertaining to an eventual sale of the apartment, including as to the treatment of co-op leases in bankruptcy.

B. Fee / Employment Applications for Other Professionals (Task Code B165)
Fees: \$18,250.00 Total Hours: 11.40

68. During the Fee Period, Paul Hastings attorneys assisted Genever (US)’s public adjuster, *i.e.*, AAGL, in connection with the March 15, 2023 fire at the Sherry Netherland apartment [Docket No. 1749], which application was granted on July 13, 2023 [Docket No. 2000]. Paul Hastings attorneys also prepared and filed the application of O’Sullivan McCormack Jensen & Bliss PC (“OMJB”), as special insurance coverage counsel to Genever (US) [Docket No. 2042], which application was granted on August 22, 2023 [Docket No. 2105].²⁹ OMJB represents Genever (US) in its adversary proceeding seeking, among other things, an injunction prohibiting AIG from cancelling certain AIG insurance policies sold to Genever (US) with respect to the Sherry Netherland Apartment.

²⁹ OMJB replaced Saxe Doernberger & Vita, P.C. as special insurance coverage counsel.

C. Other Contested Matters (Task Code B190)
Fees: \$69,610.50 Total Hours: 54.80

69. During the Fee Period, Paul Hastings attorneys prepared Genever (US)'s motion to remediate the area of the Sherry Netherland Apartment affected by the March 15, 2023 fire. As detailed in the remediation motion, the March 15, 2023 fire (including the fire department's efforts to extinguish the fire and law enforcement's investigation into the cause of the fire) has caused significant damage to an area of approximately 2,000 square feet of the apartment, leaving the apartment, for all practical purposes, in an unmarketable condition.

70. In the remediation motion, Genever (US) requested entry of an order (a) approving Genever (US)'s entry into, and performance under, into an agreement with Acheson Doyle, as architect, (b) authorizing Genever (US) to select and hire contractors, engineers, consultants, and other third-party service providers in the ordinary course of the remediation project (including as it relates to the removal of asbestos), as may be necessary to remediate the area affected by the fire, subject to certain procedures detailed in the motion, and (c) pay such contractors, engineers, consultants, and other third-party service providers in the ordinary course of the remediation project (including as it relates to the removal of asbestos).

71. In connection with preparing the remediation motion, Genever (US) and Paul Hastings also closely coordinated with, among others, the Sherry Netherland, PAX, and the U.S. Trustee. No objections were filed to the remediation motion, and, by order dated September 19, 2023 [Docket No. 2213], the Court granted the motion.

D. Business Operations (Task Code B210)
Fees: \$32,054.50 Total Hours: 19.60

72. During the Fee Period, Paul Hastings attorneys analyzed various operational matters with respect to Genever (US), including, most notably, as it relates to the remediation

project for the Sherry Netherland Apartment following the March 15, 2023 fire. In this regard, the Trustee had numerous communications with the architect (Acheson Doyle), counsel to the Sherry Netherland, and counsel to the insurer (AIG).

VI. Mahwah Adversary (Matter ID 00012)

A. Court Hearings (Task Code B155)
Fees: \$47,789.50 Total Hours: 31.10

73. During the Fee Period, Paul Hastings attorneys attended numerous hearings related to the Mahwah Adversary Proceeding (as defined below), including:

- the August 14, 2023 hearing on the Trustee's motion seeking a preliminary injunction; and
- the August 29, 2023 hearing on the Trustee's motion seeking approval of the settlement with the U.S. Department of Justice.

B. General Litigation (Task Code B191)
Fees: \$353,192.50 Total Hours: 292.10

74. During the Fee Period, Paul Hastings attorneys prepared and filed the Trustee's complaint against Scott Barnett (the Individual Debtor's driver and/or bodyguard), Taurus Fund, LLC, and Taurus Management LLC [Adv. Proc. No. 23-05017] (the "Mahwah Adversary Proceeding").³⁰ In the Mahwah Adversary Proceeding, the Trustee seeks determinations that, among other things, (a) the Debtor is the equitable owner of the 50,000 square foot Mahwah Mansion, (b) the Debtor is the equitable owner of Taurus Fund, LLC (the entity holding title to Mahwah Mansion), and (c) that Taurus Fund is an *alter ego* of the Individual Debtor.

75. In addition to preparing the complaint, Paul Hastings attorneys prepared, among other things, a motion for a temporary restraining order and preliminary injunction and related pleadings, as well as a motion to seal the filing of the complaint pending the entry of the

³⁰ The Mahwah Adversary Proceeding was commenced on July 11, 2023.

temporary restraining order. Injunctive relief and keeping the complaint temporarily under seal were necessary in order to protect the Mahwah Mansion and avoid potential damage or other issues that could arise had the complaint been filed publically. On August 1, 2023, the Court granted the motion to seal [Docket No. 16 in Adv. Proc. No. 23-05017] and entered a temporary restraining order [Docket No. 17 in Adv. Proc. No. 23-05017]. In addition, on August 24, 2023, the Court granted the requested preliminary injunction [Docket No. 47 in Adv. Proc. No. 23-05017]. After the Trustee learned that the Mahwah Mansion was not insured, Paul Hastings attorneys prepared and filed an emergency motion [Docket No. 57 in Adv. Proc. No. 23-05017] seeking to modify the preliminary injunction to further limit access to the property to certain authorized parties. The Court granted the requested modification by order dated August 31, 2023 [Docket No. 58 in Adv. Proc. No. 23-05017].

76. Furthermore, during the Fee Period, Paul Hastings attorneys prepared the Trustee's motion seeking approval of a settlement with the Government to resolve certain potentially complex issues raised both the Mahwah Adversary Proceeding and in the Government's ongoing criminal case against the Debtor currently being heard in the Criminal Case, with respect to the Debtor's Mahwah Mansion.

77. As detailed in the settlement motion, the Mahwah Mansion has become a target for the Government in the Criminal Case because the Government alleges that the Mahwah Mansion is subject to forfeiture because it was purchased with the proceeds of the Debtor's alleged criminal schemes, and that its value should be distributed to the victims of such crimes as restitution. The proposed settlement effectuates a preliminary resolution to the issues surrounding the Mahwah Mansion. Under the Settlement Agreement, the Government has agreed not to oppose any of the Trustee's claims or requests for relief in the Mahwah Adversary

Proceeding, or any effort by the Trustee to obtain control of and/or sell the Mahwah Mansion. Critically, the settlement will ensure that any proceeds from an eventual sale of the Mahwah Mansion by the Trustee (if the Trustee prevails in the Mahwah Adversary Proceeding) are used first to pay the estate's expenses (including reasonable legal fees related to the Mahwah Adversary Proceeding) in connection with taking control of and selling the Mahwah Mansion, so that the estate will not be out of pocket even if future discussions between the Trustee and the Government regarding the distribution of sale proceeds of the Mahwah Mansion do not lead to a favorable settlement from the point of view of the estate.

C. Non-Working Travel (Task Code B195)
Fees: \$11,852.75 Total Hours: 16.00

78. During the Fee Period, Paul Hastings attorneys traveled to the Federal Courthouse in Bridgeport, Connecticut, for August 14, 2023 and August 29, 2023 hearings in the Mahwah Adversary Proceeding.

VII. Golden Spring Adversary Proceeding (Matter ID 00013)

A. General Litigation (Task Code B191)
Fees: \$107,625.50 Total Hours: 95.30

79. During the Fee Period, Paul Hastings attorneys prepared and filed the Trustee's complaint against Golden Spring and China Golden Spring [Adv. Proc. No. 23-05018] (the "Golden Spring Adversary Proceeding"). In the Golden Spring Adversary Proceeding, the Trustee seeks determinations that, among other things, (a) Golden Spring is the *alter ego* of the Individual Debtor and (b) the Individual Debtor is the equitable owner of Golden Spring and/or its assets (notwithstanding China Golden Spring's purported ownership interest in Golden Spring). During the Fee Period, Paul Hastings attorneys assisted the Trustee on all matters related to the Golden Spring Adversary Proceeding, including legal analysis of the claims

asserted against Golden Spring and China Golden Spring, preparing a motion to seal the complaint, and preparing a motion to set an answer deadline.

80. Golden Spring failed to respond to the complaint, and, on September 12, 2023, the Trustee requested entry of a default judgment as against Golden Spring. The Court entered a default judgment against Golden Spring by order dated September 20, 2023 [Docket No. 17 in Adv. Proc. No. 23-05018].³¹

VIII. HCHK Adversary (Matter ID 00014)

A. Court Hearings (Task Code B155)
Fees: \$43,234.50 Total Hours: 24.60

81. During the Fee Period, Paul Hastings attorneys attended numerous hearings related to the HCHK Adversary Proceeding (as defined below), including:

- the July 11, 2023 and July 18, 2023 hearings on the Trustee's motion seeking approval of the Assignee Settlement (as defined below);
- the August 8, 2023 status conference regarding the motion of the Proposed Intervenor (as defined below) seeking to intervene in the HCHK Adversary Proceeding; and
- the August 15, 2023 pre-trial conference.

B. General Litigation (Task Code B191)
Fees: \$596,122.00 Total Hours: 478.70

82. On June 8, 2023, the Trustee filed his complaint against the HCHK Entities, the Assignee, Holy City Hong Kong Ventures, Ltd., Yvette Wang, and Anthony DiBattista [Adv. Proc. No. 23-05013] (the "HCHK Adversary Proceeding"). In the HCHK Adversary Proceeding, the Trustee seeks determinations that, among other things, (a) the HCHK Entities are *alter egos* of the Individual Debtor and (b) the Individual Debtor is the equitable owner of the

³¹ On October 11, 2023, the Trustee also requested entry of a default judgment against China Golden Spring, which also failed to respond to the complaint. As of the filing of this Application, the Court has not yet ruled on that request.

HCHK Entities and/or their assets. In addition, the complaint sought an injunction against the commencement or continuation of the assignment proceedings commenced with respect to the HCHK Entities in New York state court (the “Assignment Proceedings”). In connection with the HCHK Adversary Proceeding, the Trustee also requested and obtained a temporary restraining order (the “HCHK TRO”) as it relates to the commencement or continuation of the Assignment Proceeding. *See* Docket No. 18 in Adv. Proc. No. 23-05013.

83. Shortly after the entry of the HCHK TRO, the Trustee successfully negotiated a settlement agreement (*i.e.*, the Assignee Settlement) between the Trustee and the Assignee pursuant to Bankruptcy Rule 9019 and present such settlement to this Court. The Assignee Settlement provides for important benefits to the estate, including the deposit of over \$38 million of the HCHK Entities’ funds into accounts controlled by the Trustee and the Assignee’s commitment to not oppose the relief sought by the Trustee in the HCHK Litigation. During the Fee Period, Paul Hastings attorneys continued to assist the Trustee in prosecuting the Assignee Settlement, including preparing the Trustee’s reply in further support of his motion for approval of the Assignee Settlement [Docket No. 45 in Adv. Proc. No. 23-05013]. The Assignee Settlement was approved by order dated July 28, 2023 [Docket No. 70 in Adv. Proc. No. 23-05013]. In addition, after G-Club sought to prevent the turnover of portions of HCHK Technologies, Inc.’s (“HCHK Technologies”) corporate documents under the Assignee Settlement, Paul Hastings attorneys prepared the Trustee’s memorandum of law [Docket No. 86 in Adv. Proc. No. 23-05013] in support of the Trustee’s argument that G-Club should not be permitted to prevent the turnover of such corporate records to the Trustee as part of the Assignee Settlement.

84. Furthermore, during the Fee Period, Paul Hastings attorneys continued to assist the Trustee on all matters related to the HCHK Adversary Proceeding. Most notably, Paul Hastings attorneys handled all matters related to the motion to intervene filed by Shin Hsin Yu, 1332156 B.C. LTD, GWGOPNZ Limited, Japan Himalaya League, Inc. (collectively, the “Proposed Intervenors”) and their motion to clarify the HCHK TRO.³² For example, Paul Hastings attorneys prepared, among other things, the Trustee’s motion to authorize and compel discovery from the Proposed Intervenor [Docket No. 67 in Adv. Proc. No. 23-05013] and the Trustee’s objection to certain purported HCHK creditors to expedite the hearing on their motion to “clarify” the HCHK TRO. In addition, Paul Hastings attorneys handled the Trustee’s discovery efforts with respect to the Proposed Intervenor’s motion to intervene (including deposition preparation).

85. Finally, Paul Hastings attorneys also prepared (a) the Trustee’s motion for an order setting a deadline for Holy City Hong Kong Ventures, Ltd. to respond to the Trustee’s complaint [Docket No. 56 in Adv. Proc. No. 23-05013] and (b) the Trustee’s objection to the motion filed by certain defendants seeking to extend the time to plead and the Trustee’s related cross-motion to enter a default judgment against the defendants [Docket No. 110 in Adv. Proc. No. 23-05013]. On September 29, 2023, the Court entered a default judgment against Defendants HCHK Technologies, Inc., HCHK Property Management, Inc., Lexington Property and Staffing, Inc., and Holy City Hong Kong Ventures, Ltd. [Docket No. 139 in Adv. Proc. No. 23-05013].

³² The Trustee’s substantive responses to these motions were filed on September 15, 2023 [Docket Nos. 118 and 119 in Adv. Proc. No. 23-05013], *i.e.*, after the conclusion of the Fee Period. An evidentiary hearing on these motions has been scheduled for November 29, 2023.

- C. Non-Working Travel (Task Code B195)
Fees: \$7,953.75 Total Hours: 9.50

86. During the Fee Period, Paul Hastings attorneys traveled to the Federal Courthouse in Bridgeport, Connecticut, for July 11, 2023, July 18, 2023, and August 15, 2023 hearings in the HCHK Adversary Proceeding.

IX. Interpleader Adversary (Matter ID 00015)

- A. General Litigation (Task Code B191)
Fees: \$18,179.50 Total Hours: 11.30

87. On June 6, 2023, U.S. Bank commenced an interpleader action [Adv. Proc. No. 23-05012] (the “Interpleader Adversary Proceeding”) to resolve a dispute regarding the release of the \$33 million in Escrow Funds held by U.S. Bank in escrow pursuant to an escrow agreement between HK USA, the Committee, and U.S. Bank (the “Escrow Agreement”) entered into in connection with that certain *Stipulated Order Compelling HK International Funds Investments (USA) Limited, LLC to Transport and Deliver that Certain Yacht, The “Lady May”* entered by the Court on April 29, 2022 [Docket No. 299].³³

88. While the bulk of the services provided to the Trustee in connection with the Interpleader Adversary Proceeding was undertaken by the Trustee’s local counsel, *i.e.*, NPM, Paul Hastings attorneys performed certain discrete tasks related to the Interpleader Adversary Proceeding, including analyzing and commenting on the draft reply in support of the Trustee’s motion for summary judgment. Moreover, Paul Hastings attorneys handled the July 11, 2023 hearing on the Trustee’s summary judgment motion.

³³ U.S. Bank commenced the Interpleader Adversary Proceeding following the Court’s ruling [Docket No. 221 in Adv. Proc. No. 22-05003] in the HK USA Adversary Proceeding that (a) among other things, all property of HK USA, including the Escrow Funds, are property of the Individual Debtor’s estate, and (b) directing HK USA to deliver all property of HK USA to the Trustee. The Trustee takes the position that this ruling requires the immediate turnover of such funds to the Trustee. However, HK USA has refused to instruct U.S. Bank to release the funds to the Trustee and, instead, taken the position that, under the Escrow Agreement, the funds cannot be turned over to the Trustee, absent a final, non-appealable order to that effect.

89. On September 7, 2023, the Court granted the summary judgment motion [Docket No. 57 in Adv. Proc. No. 23-05012], authorizing the Trustee to remove the Escrow Funds from the segregated account and deposit such funds into the estate's general account(s).³⁴

X. Mei Guo Adversary (Matter ID 00016)

A. General Litigation (Task Code B191)
Fees: \$96,447.00 Total Hours: 79.00

90. During the Fee Period, Paul Hastings attorneys continued to prosecute the Trustee's complaint against Mei Guo [Adv. Proc. No. 22-05008] (the "Mei Guo Adversary Proceeding"). In the Mei Guo Adversary Proceeding, the Trustee seeks (a) an order declaring that the proceeds, likely in an amount of over \$10 million, from the sale of the Individual Debtor's private Bombardier jet (the "Bombardier Proceeds") are property of the estate, (b) an order that Mei Guo surrender the Bombardier Proceeds or the value thereof to the Trustee because she received the Bombardier Proceeds as an unauthorized postpetition transfer avoidable under section 549 of the Bankruptcy Code, (c) an order that Mei Guo surrender to the Trustee the value of the Debtor's shell company Anton Development Limited at the time the company was transferred to her on June 27, 2017 (upon which date Anton Development Limited was title holder to the Bombardier jet) pursuant to a transaction avoidable as an actual fraudulent transfer, and (d) an order declaring that a series of BVI registered shell companies purportedly held by Mei Guo are property of the Individual Debtor's chapter 11 estate.

91. During the Fee Period, Paul Hastings attorneys continued to handle the Mei Guo Adversary Proceeding, including (a) preparing initial disclosures, (b) preparing a joint pre-trial order, and (c) handling all discovery matters, including preparing discovery requests.

³⁴ On September 14, 2023, HK USA appealed the summary judgment order [Docket No. 60 in Adv. Proc. No. 23-05012].

XI. HK USA Adversary (Matter ID 00017)

A. General Litigation (Task Code B191)
Fees: \$166,714.50 Total Hours: 122.60

92. During the Fee Period, Paul Hastings attorneys handled all matters arising out of HK USA and Mei Guo’s appeal of this Court’s rulings in connection with the Trustee’s counterclaims against HK USA and Mei Guo [Adv. Proc. No. 22-05003] (the “HK USA Adversary Proceeding”). In the HK USA Adversary Proceeding, this Court determined that, among other things, (a) the Lady May and the Lady May II are property of the Individual Debtor’s estate, (b) HK USA is an *alter ego* of the Individual Debtor, and (c) the \$33 million held in escrow by U.S. Bank are property of the estate [Docket Nos. 172 and 221 in Adv. Proc. No. 22-05003].

93. HK USA and Mei Guo have appealed these ruling to the District Court as well as sought a stay pending appeal. In connection with this appeal, Paul Hastings attorneys prepared, among other things, (a) the Trustee’s response to the appellants’ emergency motion for a stay pending appeal (which motion to the District Court denied), and (b) the Trustee’s appellee brief (which was filed on September 6, 2023).

XII. Bravo Luck Adversary (Matter ID 00018)

A. General Litigation (Task Code B191)
Fees: \$ \$75,247.50 Total Hours: 50.80

94. During the Fee Period, Paul Hastings attorneys assisted the Trustee, Genever (BVI), and Genever (US) in negotiating a consensual resolution of their claims against Bravo Luck and the Debtors’ son, Mr. Qiang Guo [Adv. Proc. No. Adversary Proceeding No. 23-05027] (the “Bravo Luck Adversary Proceeding”). In the Bravo Luck Adversary Proceeding, the Trustee, Genever (BVI), and Genever (US) had challenged the validity and enforceability of a

purported trust agreement between the Individual Debtor, Genever (BVI), Genever (US), and Bravo Luck, pursuant to which Bravo Luck was purportedly granted a beneficial ownership of the Sherry Netherland Apartment, as well as asserting fraudulent transfer claims against Bravo Luck and Mr. Qiang Guo.

95. In particular, during the Fee Period, Paul Hastings attorneys negotiated and prepared the settlement agreement with Bravo Luck and Mr. Qiang Guo as well as prepared the related motion to approve such settlement, which motion was filed on August 4, 2023 [Docket No. 111 in Adv. Proc. No. 23-05027]. As a result of the settlement, the Trustee, Genever (US) and Genever (BVI) obtained the primary relief they sought in the Bravo Luck Adversary Proceedings—namely, undisputed beneficial ownership and control of the Sherry Netherland Apartment. The settlement was approved by order dated August 30, 2023 [Docket No. 118 in Adv. Proc. No. 23-05027]. To the extent not obvious from the settlement documents filed in connection with this motion, the settlement reflects a complete and unconditional vindication of the Trustee’s position in this matter.

XIII. Greenwich Land Adversary (Matter ID 00020)

A. General Litigation (Task Code B191)
Fees: \$735,135.50 Total Hours: 586.80

96. During the Fee Period, Paul Hastings attorneys continued to prosecute the Trustee’s complaint against Greenwich Land and Hing Chi Ngok [Adv. Proc. No. 23-05005] (the “Greenwich Land Adversary Proceeding”). In the Greenwich Land Adversary Proceeding, the Trustee seeks determinations that, among other things, (a) Greenwich Land is an *alter ego* of the Individual Debtor and (b) the Individual Debtor is the equitable owner of Greenwich Land. Paul Hastings’ efforts thus far have resulted in critical prejudgment remedies and injunctive relief to protect the assets of Greenwich Land, including the Individual Debtor’s mansion on Taconic

Road in Greenwich, Connecticut, pending the outcome of the Greenwich Land Adversary Proceeding, for the benefit of the estate.

97. During the Fee Period, Paul Hastings attorneys prepared several filings in the Greenwich Land Adversary Proceeding, including, most notably, the Trustee's objection to defendants' motion to withdraw the reference to the District Court [Docket No. 63 in Adv. Proc. No. 23-05005]. All the while, Paul Hastings handled all matters related to the discovery in the Greenwich Land Adversary Proceeding, including (a) preparing responses to the defendants' document requests, interrogatories, and requests for admission, (b) preparing subpoenas and deposition notices, (c) reviewing documents produced, (d) participating in meet & confer sessions with the defendants, (e) preparing for depositions, and (f) preparing witness declarations. In addition, Paul Hastings attorneys deposed Ms. Emile DeNeree (the former real estate broker to the Individual Debtor) on August 24, 2023, and defended the deposition of the Trustee on August 23, 2023. All these discovery efforts culminated in the Trustee's motion for summary judgment [Docket No. 77 in Adv. Proc. No. 23-05005], which was filed on October 10, 2023. Among other things, the Trustee submits that summary judgment is appropriate here because the defendants have no knowledge of the management or operations of Greenwich Land, nor do they have any basis to dispute the substantial evidence that the Debtor is, and always has been, the one who truly owns and controls Greenwich Land.

REASONABLENESS OF COMPENSATION

98. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330(a) of the Bankruptcy Code provides that, after notice and a hearing, the Court may award a professional employed under 11

U.S.C. § 327 “reasonable compensation for actual, necessary services rendered” and “reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1).³⁵

99. In determining the amount of “reasonable compensation,” the Court must consider the nature, extent, and value of the services, taking into account all the relevant factors, including the time spent on such services, the rates charged for such services, whether the services were necessary and beneficial, whether the services were performed in a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed, and whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code. See 11 U.S.C. § 330(a)(3). The Court enjoys “considerable discretion in determining reasonable fee awards.” *In re Ahead Communication Systems, Inc.*, 395 B.R. 512 (D. Conn. 2008).

100. In assessing the “reasonableness” of the fees requested, the Second Circuit has stated that courts should consider the factors enumerated in *Johnson v. Ga. Highway Express, Inc.*,³⁶ while also incorporating the “lodestar method.” See *Arbor Hill Concerned Citizens Neighborhood Ass’n v. County of Albany and Albany County Bd. of Elections*, 522 F.3d 182, 190 (2d Cir. 2007) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir.1974), *abrogated on other grounds by Blanchard v. Bergeron*, 489 U.S. 87, 92–93, 96 (1989)). The

³⁵ Under section 328(a) of the Bankruptcy Code, with bankruptcy court approval, a trustee may employ professional persons under section 327(a) of the Bankruptcy Code “on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis.” 11 U.S.C. § 328(a).

³⁶ The twelve *Johnson* factors are (1) the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) the time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the “undesirability” of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases. *Johnson*, 488 F.2d at 717-19.

“lodestar method” of calculating the reasonable fee contemplates “the number of hours reasonably expended . . . multiplied by a reasonable hourly rate.” *See Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *Gisbrecht v. Barnhart*, 535 U.S. 789, 801 (2002); *Perdue v. Kenny A.*, 130 S.Ct. 1662, 1672 (2010); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13 (Bankr. S.D.N.Y. 1991). The factors set forth in *Johnson* and *In re First Colonial Corp. of Am.*, 544 F.2d 1291, 1298–99 (5th Cir. 1977) have been adopted by most courts.³⁷ *See In re Nine Assocs., Inc.*, 76 B.R. 943, 945 (S.D.N.Y. 1987) (adopting *First Colonial/Johnson* analysis); *In re Cuisine Magazine, Inc.*, 61 B.R. 210, 212–13 (Bankr. S.D.N.Y. 1986) (same); *Green v. City of New York*, 403 F. Appx. 626, 629 (2d Cir. 2010) (summary order); *see generally* 3 COLLIER ON BANKRUPTCY ¶ 330.03[9] (Lawrence P. King ed., 16th ed. 2016) (describing *First Colonial* and *Johnson* as the “leading cases with regard to the factors to be considered in determining a reasonable allowance of compensation”).

101. In accordance with the factors enumerated in section 330 of the Bankruptcy Code and applicable case law, the amount requested herein by Paul Hastings is fair and reasonable, as set forth below and otherwise in this Application.

a. **Time and Labor Required**

Paul Hastings billed a total of \$3,725,984.25 and 3031.60 hours, respectively, of professional and paraprofessional services during the Fee Period. As evidenced by this Application, Paul Hastings professionals and paraprofessionals worked diligently and efficiently without unnecessary duplication of efforts throughout the Fee Period. A small group of the same Paul Hastings attorneys was utilized for the vast majority of the work in order to minimize the costs of intra-Paul Hastings communication and education about the Debtors’ circumstances. Whenever possible, Paul Hastings sought to minimize the cost of Paul Hastings’ services by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. The services were performed in an effective and efficient manner commensurate with the complexity, exigency, and

³⁷ The factors articulated in *First Colonial* were first articulated by the Fifth Circuit in *Johnson*, with the *First Colonial* court adding the factor of the “spirit of economy,” which was later rejected by Congress. *See Stroock & Stroock & Lavan v. Hillsborough Holdings Corp. (In re Hillsborough Holdings Corp.)*, 127 F.3d 1398, 1403 (11th Cir. 1997).

importance of the issues involved. In addition, Paul Hastings' representation has required it to balance the need to provide quality services with the need to act quickly and represent the Trustee and the Genever Debtors in an effective, efficient, and timely manner. Paul Hastings submits that the hours spent were reasonable given the size and complexity of these chapter 11 cases, the significant, and often urgent, legal and business issues raised, and the numerous pleadings filed in the chapter 11 cases. Furthermore, as noted detailed above, the Trustee and the Genever Debtors also retained NPM as local and conflicts counsel in order to provide services to the Trustee and the Genever Debtors in a cost-effective manner. Paul Hastings and NPM have coordinated and will continue to coordinate each firm's respective responsibilities in connection with the representation of the Trustee and the Genever Debtors.

b. **Novelty and Difficulty of the Questions**

Paul Hastings tasked knowledgeable attorneys to research, analyze, and advise the Trustee and the Genever Debtors on difficult and complex issues during the Fee Period, including issues related to bankruptcy and litigation. Most notably, as detailed in this Application, Paul Hastings investigated complex estate claims and causes of action in order to recover assets of these estates.

c. **Skill Requisite to Perform the Legal Services Properly**

Paul Hastings believes that its recognized expertise in the areas of financial restructuring and corporate reorganization, its ability to draw from highly experienced professionals in other areas of Paul Hastings' practice, and its creative approach to the resolution of issues has contributed to the effective administration of these chapter 11 cases and benefited the Trustee, the Genever Debtors, their estates, and their unsecured creditors. Due to the nature and complexity of the legal issues presented by these chapter 11 cases, Paul Hastings was required to exhibit a high degree of legal skill in areas related to, among others, bankruptcy and litigation.

d. **Preclusion of Other Employment by Applicant Due to Acceptance of the Case**

Due to the size of Paul Hastings' restructuring and litigation departments, Paul Hastings' representation of the Trustee and the Genever Debtors did not preclude its acceptance of new clients, but the demands for immediate and substantive action in these chapter 11 cases imposed significant burdens on Paul Hastings professionals and paraprofessionals working concurrently on other matters. That said, for the Trustee, his engagement as a chapter 11 trustee has, for all practical purposes precluded other employment given that this matter is taking up most of his time and there frequently are two hearings per week.

e. **Customary Fee**

The fees charged by Paul Hastings in these chapter 11 cases are billed in accordance with its existing billing rates and procedures in effect during the Fee Period. The rates Paul Hastings charges for the services rendered by its professionals and paraprofessionals in these chapter 11 cases are comparable to

the rates Paul Hastings charges for professional and paraprofessional services rendered in comparable nonbankruptcy related matters. Moreover, when Paul Hastings' restructuring professionals and paraprofessionals work on nonbankruptcy matters, the firm generally charges their standard rate. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market. In addition, the firm's customary hourly rates and rate structure reflect that restructuring and related matters typically involve great complexity, numerous tasks requiring a high level of expertise, and severe time pressures, as is the case here.

f. **Whether the Fee Is Fixed or Contingent**

Pursuant to Bankruptcy Code sections 330 and 331, all fees sought by professionals employed under Bankruptcy Code section 1103 are subject to final approval by the Court, and are subject to adjustment depending on the services rendered and the results obtained. Of particular note, payment of Paul Hastings' fees here was contingent in two respects: (1) the recovery of assets for the benefit of the estates and (2) monetizing such assets. At the outset of these chapter 11 cases, there was no assurance whatsoever that assets would be recovered and monetized to allow for the payment of estate professionals. Accordingly, Paul Hastings' compensation was, in essence, a contingency fee arrangement. The risk that Paul Hastings assumed by representing the Trustee and the Genever Debtors further supports the reasonableness of Paul Hastings' compensation.

g. **Time Limitations Imposed by the Client or Other Circumstances**

During the Fee Period, Paul Hastings was required to analyze and address certain issues arising in these chapter 11 cases under compressed timelines. For example, given the Individual Debtor's track record of moving assets to keep them out of reach of creditors, it was critical that Paul Hastings act quickly on information obtained during the Trustee's investigation in order to freeze assets.

h. **Amount Involved and Results Obtained**

Paul Hastings professionals and paraprofessionals worked diligently to maximize value for these chapter 11 estates. During the Fee Period, and as described in the summary of services herein, Paul Hastings was instrumental in analyzing potential sources of recovery for the benefit of these estates. As a result of Paul Hastings' efforts, the Trustee has been able to recover, among other assets, the Lady May, the Lady May II, and \$33 million in escrow funds. Moreover, on August 1, 2023, the Trustee received approximately \$38.8 million in funds pursuant to the settlement with the Assignee in the HCHK Adversary Proceeding. Furthermore, during the Fee Period, Paul Hastings was able to secure several key rulings from the Court, which rulings will serve as a beachhead for future asset recovery efforts. The reasonableness of Paul Hastings' fees must be evaluated in light of this important strategic factor as well.

i. **Experience, Reputation, and Ability of Attorneys**

Paul Hastings is consistently recognized as a top tier law firm in the field of business reorganizations and liquidations under chapter 11. During the Application Period, Paul Hastings solicited the skill and expertise of its professionals and paraprofessionals. Paul Hastings professionals have actively represented debtors, creditors, and creditors' committees, as well as other parties in interest, in a number of the nation's largest chapter 11 cases as well as in connection with cross-border restructurings. Paul Hastings' extensive experience enables it to perform the services described herein competently and expeditiously. In addition to its expertise in the area of corporate reorganization, Paul Hastings has called upon the expertise of its attorneys in other practice areas as required during the Fee Period.

j. **"Undesirability" of the Cases**

As detailed in this Application, the Individual Debtor's in-court and out-of-court tactics illustrate the undesirability of this engagement, which involved harassment of the Trustee and Paul Hastings attorneys (including death threats against the Trustee). As a result, Paul Hastings was forced to incur hundreds of thousands of dollars in cyber security measures (the cost of which are not part of the expenses for which Paul Hastings is seeking reimbursement in this Application). In addition, prior to the Court granting the First Interim Fee Application at the end of June 2023, Paul Hastings was unable to get paid for its fees for almost a year.

k. **Nature and Length of Professional Relationship**

Paul Hastings has been rendering professional services to (a) the Trustee since its retention as counsel effective as of July 8, 2022, (b) Genever (BVI) since its retention as counsel effective as of October 11, 2022, and (c) Genever (US) since its retention as counsel effective as of November 3, 2022.

102. Paul Hastings respectfully submits that the services for which it seeks compensation in this Fee Application were, at the time rendered, necessary for and beneficial to the Debtors' estates and their creditors and were rendered to maximize, protect, and preserve value for the Debtors' estates and all parties in interest. Paul Hastings believes that it provided services economically, effectively, and efficiently, and obtained results beneficial to the Debtor's estate and his creditors. Paul Hastings further submit that the compensation requested herein is reasonable in light of the nature, extent, and value of the services rendered during the Fee Period.

103. Paul Hastings also notes that the rates charged during the Fee Period are reasonable. In fact, this Court recently held that Paul Hastings' New York rates are reasonable

because Paul Hastings was retained at New York rates and these cases are extraordinary within this District. *See Order Denying Motion for Stay Pending Appeal* [Docket No. 1791].

104. All fees incurred by Paul Hastings during the Fee Period were actual, reasonable, and necessary in the performance of services for the Trustee and the Genever Debtors. Paul Hastings respectfully requests approval of the compensation sought herein.

ACTUAL AND NECESSARY DISBURSEMENTS

105. As set forth in Exhibit C hereto, Paul Hastings incurred and disbursed \$146,137.57 as expenses in providing professional services during the Fee Period. These expenses include approximately \$15,562.56 for online legal research (*i.e.*, LEXIS and Westlaw). Because Paul Hastings believes that online legal research (*e.g.*, LEXIS and Westlaw) is far more cost-efficient than manual research using hard-bound volumes, Paul Hastings encourages computerized legal research even though it is not a profit center for Paul Hastings. To be clear, Paul Hastings does not charge a mark-up on the LEXIS and Westlaw charges, but merely passes on the costs of such third-party services. Moreover, as it relates to outside professional services, mailing, and other service-related expenses, the Trustee and Paul Hastings are merely passing on the costs of such third-party services, without any mark-up.³⁸

106. Additional necessary expenses included:

- \$94,724.02 for certain outside professional services, such as document review services by UnitedLex (\$93,448.02) and translation services by Divergent Language Solutions (\$1,276.00);
- \$5,735.52 for document reproductions, namely \$5,312.32 for b/w reproductions (at 8 cents per page) and \$423.20 for color reproductions (at 20 cents per page);
- \$5,256.99 for UPS/courier service, including service of pleadings required to be served in hard copy format;

³⁸ Documentation of these expenses will be made available to the Court upon request.

- \$3,576.19 for court reporting services;
- \$1,725.00 for process servers (*e.g.*, Metro Attorney Service Inc.) to serve, among other things, the subpoenas issued pursuant to the Rule 2004 orders entered by this Court; and
- \$321.35 for corporate document retrieval services (including United Corporate Service and Corp2000) with respect to various Kwok-related entities.

107. During the Fee Period, Paul Hastings utilized UnitedLex—a third party vendor that specializes in discovery services including document processing, storage, review services, and distribution—to conduct document review of the documents produced in the chapter 11 cases, including the more than 140,000 discovery documents received by the Trustee to date in connection with his investigation.

108. Using their own contract attorneys and review team managers, UnitedLex provides an efficient and economic means of reviewing large document sets at hourly rates significantly lower than Paul Hastings. UnitedLex’s document review team charges hourly rates ranging from \$40 to \$55 (for non-management roles) and \$150 (for management role), which is substantially less than Paul Hastings’ hourly rates and, moreover, is even less than the hourly rates of associates of local Connecticut counsel (*i.e.*, NPM), which rates range from \$200 to \$400. For all these reasons, Paul Hastings believes that utilizing the UnitedLex document review team greatly benefits these estates by reducing document review costs. The Trustee also previewed Paul Hastings’ use of UnitedLex with the U.S. Trustee, who had no objection thereto (without the Trustee having to file a separate retention application for UnitedLex). The Trustee and Paul Hastings also disclosed in the *Fourth Supplemental Declaration of Disinterestedness of Luc A. Despins* [Docket No. 1435] that Paul Hastings would utilize UnitedLex’s contract attorneys services.

109. The time constraints imposed by the circumstances of the matters handled by Paul Hastings during the Fee Period required its attorneys and other employees, at times, to devote substantial time during the evenings and on weekends to perform legal services on behalf of the Trustee. These extraordinary services were essential to meet deadlines, timely respond to inquiries on a daily basis, and satisfy the Trustee's needs and demands. Attorneys and other Paul Hastings employees who worked late in the evenings or on weekends were reimbursed for their reasonable meal and transportation costs in accordance with firm policy. Paul Hastings' regular practice is not to include components for those charges in overhead when establishing billing rates, but rather to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the provision of legal services.

110. In accordance with *Appendix D (Guidelines for Compensation and Expense Reimbursement of Professionals)* to the Local Rules, reproduction charges have been capped at 20 cents per page.³⁹

111. The expenses requested herein are customarily charged to non-bankruptcy clients of Paul Hastings. Additionally, the expenses incurred by Paul Hastings to third parties are limited to the actual amounts billed to, or paid by, Paul Hastings on behalf of the estates.

112. Paul Hastings believes the rates for charges incurred are the market rates that the majority of law firms charge clients for such services. In addition, Paul Hastings believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

³⁹ Generally, Paul Hastings charges 8 cents per page for black-and-white reproductions and 50 cents per page for color reproductions. In accordance with Appendix D to the Local Rules, Paul Hastings has reduced the charge for color reproductions to 20 cents per page.

113. The expenses incurred in providing professional services in the Chapter 11 Case were necessary, economical, and justified under the circumstances.

RESPONSE TO THE U.S. TRUSTEE GUIDELINES

114. Paul Hastings responds to the questions set forth in Paragraph C.5. of the U.S. Trustee Guidelines as follows:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Fee Period?

Response: Yes. As a courtesy to these estates and based on circumstances unique to these chapter 11 cases, during the Fee Period, Paul Hastings agreed to voluntary fee reductions aggregating \$124,820.25, including the following:

- (i) Paul Hastings did not implement the August 1, 2023 firm-wide hourly rate increase in these chapter 11 cases and, instead, maintained the existing rates for the Fee Period. This translates into \$62,236.50 in waived fees.
- (ii) Paul Hastings is not seeking allowance or payment at this time of the fees incurred by twenty one (21) timekeepers who billed less than five (5) hours during the Fee Period. The total amount of such fees is \$37,232.00. The time billed by these timekeepers was reasonable, and Paul Hastings reserves the right to seek allowance of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance of Paul Hastings' fees and expenses.
- (iii) As a result of the agreed-upon reduction in Luc Despins' hourly rate (from his standard hourly rate of \$1,975 to the reduced hourly rate of \$1,860), an additional \$25,351.75 in fees have been waived.

Question: If the fees sought in this application as compared to the fees budgeted for the Fee Period are higher by 10% or more, did you discuss the reasons for the variation with the client.

Response: Not applicable.

Question: Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The Application does not include time for preparing, reviewing, or revising time records. However, the Application does include approximately 36.5 hours and associated fees of approximately \$58,916.00 related to preparing, reviewing, and revising Paul Hastings' fee statements and ensuring time entries are properly categorized by matter number and task code. On average, less than 7.5 hours were spent on each of the five monthly fee statements prepared during the Fee Period.

Question: Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rates increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: As is customary, Paul Hastings adjusts its hourly rates periodically based upon (i) the advancing seniority of its professionals and paraprofessionals, (ii) the current market for legal services, (iii) the rates charged for comparable non-bankruptcy services, and (iv) the firm's analysis of the hourly rates being charged by professionals in other law firms. Effective January 1, 2023, Paul Hastings adjusted its hourly rates consistent with the Retention Order [Docket No. 668] and the *Notice of Change in Hourly Rates of Paul Hastings LLP, Counsel to Chapter 11 Trustee* [Docket No. 1251].

RESERVATION OF RIGHTS

115. To the extent that time or disbursement charges for services rendered or expenses incurred during the Fee Period are not included in this Application, or the Trustee and Paul Hastings have for any reason not sought compensation or reimbursement with respect to such services, Paul Hastings reserves the right to request compensation and reimbursement for such services in a supplemental or future application in the Debtors' chapter 11 cases. Also, Paul Hastings does not waive, and expressly reserves, its right to respond to any objections regarding this Application and the amounts sought for services rendered and expenses incurred.

NO PRIOR REQUEST

116. No previous request for the relief sought herein has been made to this Court or any other court.

[Remainder of page intentionally left blank.]

WHEREFORE, Paul Hastings respectfully requests entry of an order, substantially in the form attached hereto as Exhibit G, (i) allowing interim compensation for professional services rendered during the Fee Period in the amount of \$3,725,984.25 and reimbursement of \$146,137.57 in expenses, (ii) authorizing payment from the Debtors' estates of 80% of such compensation and 100% of such expenses as it relates to the July 2023 and August 2023 services, (iii) allowing such compensation and payment for professional services rendered and reimbursement of actual and necessary expenses incurred without prejudice to the Trustee's and Paul Hastings' right to seek further compensation and/or payment from the Debtors' estates for the full value of services performed and expenses incurred, and (iv) granting the Trustee and Paul Hastings such other and further relief as is just.

Dated: October 16, 2023
New Haven, Connecticut

By: /s/ Patrick R. Linsey
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Holdings Corporation, and Genever Holdings
LLC*

EXHIBIT A

Customary and Comparable Compensation Disclosures

The blended hourly rate for Paul Hastings’ timekeepers in its New York office who billed to non-bankruptcy matters (collectively, the “Non-Bankruptcy Matters”)¹ during the twelve-month period beginning on September 1, 2022 and ending on August 31, 2023 was, in the aggregate, approximately \$1,150 per hour. The blended hourly rate for Paul Hastings’ timekeepers who billed to the Debtor’s chapter 11 cases during the Fee Period was approximately \$1,229 per hour. A detailed comparison of these rates follows:

Category of Timekeeper	Blended Hourly Rate	
	Non-Bankruptcy Matters Blended Hourly Rate	Debtor Blended Hourly Rate ²
Partner	\$1,540	\$1,709
Counsel	\$1,359	\$1,589
Associate	\$944	\$1,074
Paraprofessionals	\$477	\$540
All Timekeepers Aggregated	\$1,150	\$1,229

¹ It is the nature of Paul Hastings’ practice that certain non-bankruptcy engagements require the advice and counsel of professionals and paraprofessionals who work primarily within Paul Hastings’ restructuring group. Accordingly, Non-Bankruptcy Matters consist of matters for which Paul Hastings’ timekeepers represented a client in matters other than court-approved engagements as counsel for the debtor, the chapter 11 trustee, or an official committee under the Bankruptcy Code. As such, the Non-Bankruptcy Matters include, in part, time billed by Paul Hastings’ timekeepers who work primarily within Paul Hastings’ restructuring group.

² Luc A. Despina, the lead attorney on this matter and the co-chair of Paul Hastings’ Global Restructuring Practice, brings to the Title III Cases over 35 years of experience representing debtors and creditors in high profile and complex restructuring matters. Given the complexity and challenges faced by the Trustee in these cases, a significant amount of time by senior partners, of counsel, and senior associates, including Mr. Despina, Nicholas Bassett, Alexander Bongartz, Avi Luft, Douglass Barron, and Shlomo Maza has been necessary. Because their rates are at the higher end of the range of rates billed by Paul Hastings partners, of counsel, and associates, respectively, and in light of the fact that a significant amount of senior partner, of counsel, and senior associate time has been required for this engagement, the blended rate for this case moved to the higher end of the range of rates billed by Paul Hastings. Finally, the blended attorney hourly rate for the Fee Period is not comparable to the average hourly rate in other matters because it does not reflect numerous cost-saving measures, including the delegation of a variety of matters to NPM, matters for which otherwise more junior Paul Hastings attorneys with lower hourly rates would have been used, thereby reducing Paul Hastings’ blended hourly rate.

EXHIBIT B1

Summary of Timekeepers Included in this Application

Name	Department; Date of First Admission	Hourly Rate Billed	Hours Billed	Total Fees Billed in this Application	Number of Rate Increases Since Case Inception
Partners (3)					
Bassett, Nicholas	Corporate, 2007	\$1,625.00	261.10	\$424,287.50	1
Bassett, Nicholas (travel; ½ rate)	Corporate, 2007	\$812.50	8.50	\$6,906.25	1
Cota, Alex	Corporate, 2012	\$1,725.00	7.20	\$12,420.00	N/A
Despins, Luc	Restructuring, 1986	\$1,860.00	218.30	\$406,038.00	N/A
Despins, Luc (travel; ½ rate)	Restructuring, 1986	\$930.00	4.30	\$3,999.00	N/A
Partner Total:			499.40	\$853,650.75	
Of Counsel (4)					
Bongartz, Alex	Restructuring, 2007	\$1,625.00	172.00	\$279,500.00	1
Bongartz, Alex (travel; ½ rate)	Restructuring, 2007	\$812.50	1.30	\$1,056.25	1
Luft, Avi	Corporate, 2000	\$1,625.00	385.20	\$625,950.00	1
Luft, Avi (travel; ½ rate)	Corporate, 2000	\$812.50	18.90	\$15,356.25	1
Traxler, Katherine	Restructuring, 1990	\$1,025.00	7.40	\$7,585.00	1
Of Counsel Total:			584.80	\$929,447.50	
Associates (13)					
Barron, Douglass	Corporate, 2012	\$1,320.00	314.50	\$415,140.00	1
Catalano, Kristin	Corporate, 2021	\$915.00	107.50	\$98,362.50	1
Farmer, Will	Corporate, 2018	\$1,235.00	235.20	\$290,472.00	1
Ganapathi, Anuva	Litigation, 2021	\$915.00	11.60	\$10,614.00	1
Grabias, Maria	Corporate, 2016	\$1,290.00	16.30	\$21,027.00	N/A
Kim, Sarah	Litigation, 2023	\$855.00	9.10	\$7,780.50	N/A
Koch, Leonie	Corporate, 2023	\$855.00	9.20	\$7,866.00	1
Kosciewicz, Jon	Litigation, 2021	\$915.00	102.10	\$93,421.50	1
Maza, Shlomo	Corporate, 2012	\$1,320.00	152.50	\$201,300.00	1
Sadler, Tess	Corporate, 2019	\$1,175.00	14.40	\$16,920.00	1
[redacted]	Corporate, 2023	\$815.00	353.90	\$288,428.50	1
[redacted](travel ½ rate)	Corporate, 2023	\$407.50	7.00	\$2,852.50	1
Sutton, Ezra	Corporate, 2021	\$1,015.00	307.50	\$312,112.50	1
[redacted]	Corporate, 2022	\$915.00	29.40	\$26,901.00	
Associate Total:			1,670.20	\$1,793,198.00	
Paraprofessionals (2)					
Kuo, Jocelyn	Paralegal	\$540.00	92.80	\$50,112.00	N/A
Mohamed, David	Paralegal	\$540.00	184.40	\$99,576.00	1
Paraprofessional Total:			277.20	\$149,688.00	
TOTAL:			3,031.60	\$3,725,984.25	
BLENDED HOURLY RATE:		\$1,229			

EXHIBIT B2

Summary of Timekeepers Not Included in this Application¹

Name	Department; Date of First Admission	Hourly Rate Billed	Hours Billed	Total Fees Billed in this Application
Partners (1)				
Weitzman, Avi	Litigation, 2000	\$1,700.00	2.10	\$3,570.00
Partner Total:			2.10	\$3,570.00
Of Counsel (3)				
Shelley, Scott	Corporate, 1994	\$1,525.00	4.10	\$6,252.50
Strickon, Harvey	Corporate, 1972	\$1,900.00	0.30	\$570.00
Zhu, Sarah	Litigation, 2017	\$1,500.00	0.20	\$300.00
Of Counsel Total:			4.60	\$7,122.50
Associates (5)				
Daly, Crispin	Corporate, 2010	\$1,320.00	1.60	\$2,112.00
Hibbard, Jack	Corporate, 2022	\$855.00	4.70	\$4,018.50
Miliotes, Lanie	Corporate, 2023	\$855.00	4.30	\$3,676.50
Shum, Kevin	Corporate, 2014	\$1,235.00	1.60	\$1,976.00
[redacted]	Corporate, 2016	\$1,125.00	2.40	\$2,700.00
Associate Total:			14.60	\$14,483.00
Other Attorneys (2)				
Langer, Bobbi	Real Estate, 1984	\$975.00	2.40	\$2,340.00
Swartz, Robin	Real Estate, 1992	\$1,255.00	1.00	\$1,255.00
Other Attorney Total:			3.40	\$3,595.00
Paraprofessionals (10)				
Austin, Javii	Legal Research Analyst	\$400.00	3.80	\$1,520.00
Chang, Irene	Legal Research Analyst	\$400.00	0.60	\$240.00
Ecklund, Amy	Technical Operations Senior Analyst	\$420.00	2.20	\$924.00
Elliott, Elizabeth	Legal Research Analyst	\$400.00	2.60	\$1,040.00
Funao, Miho	Administrative Professional	\$250.00	0.30	\$75.00
Hopkovitz, Yael	Legal Research Attorney	\$450.00	1.60	\$720.00
Liu, Kelly	Legal Research Analyst	\$400.00	3.40	\$1,360.00
Lopez, Mayra	Technical Operations Senior Analyst	\$375.00	2.30	\$862.50
O'Dea, Heather	Legal Research Analyst	\$400.00	2.50	\$1,000.00
Reid, Alex	Legal Research Analyst	\$400.00	1.80	\$720.00
Paraprofessional Total:			21.10	\$8,461.50
TOTAL:			45.80	\$37,232.00

¹ As noted, as an accommodation to these estates, Paul Hastings is not seeking allowance or payment at this time for the fees of timekeepers who billed less than five (5) hours during the Fee Period in the aggregate amount of \$37,232.00. The time billed by these timekeepers was reasonable, and Paul Hastings reserves the right to seek allowance of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance of Paul Hastings' fees and expenses.

EXHIBIT C

Summary of Compensation by Project Category

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Billed
B110 Case Administration	82.20	\$75,463.50
B113 Pleadings Review	86.50	\$48,015.50
B120 Asset Analysis and Recovery	1.10	\$2,046.00
B130 Asset Disposition	8.50	\$11,226.50
B131 Sale of Real Estate	8.20	\$10,621.00
B155 Court Hearings	120.20	\$151,382.50
B160 Employment / Fee Applications (Paul Hastings)	103.60	\$148,148.50
B165 Employment / Fee Applications (Other Professionals)	48.00	\$74,470.00
B190 Other Contested Matters	59.60	\$77,833.50
B191 General Litigation	1,796.60	\$2,252,200.00
B195 Non-Working Travel	40.00	\$30,170.25
B210 Business Operations	36.40	\$55,663.00
B211 Financial Reports (Monthly Operating Reports)	9.30	\$10,983.00
B230 Financing / Cash Collections	174.00	\$225,833.00
B261 Investigations	451.20	\$542,812.50
B262 Contempt Proceedings	5.10	\$7,897.50
B310 Claims Administration and Objections	1.10	\$1,218.00
TOTAL	3,031.60	\$3,725,984.25

EXHIBIT D

Summary of Compensation by Matter ID

Matter ID	Matter Name	July 2023	August 2023	Total Fees
00001	General Chapter 11 Trustee Representation	\$362,796.50	\$232,991.50	\$595,788.00
00002	Asset Recovery Investigation and Litigation	\$219,121.50	\$423,272.75	\$642,394.25
00003	Other Litigation	\$2,431.00	\$50,735.00	\$53,166.00
00004	Corporate Law Issues	\$12,843.50		\$12,843.50
00005	Sale Process	\$7,875.50	\$2,275.00	\$10,150.50
00006	Tax Issues	\$0.00	\$0.00	\$0.00
00007	Foreign Law Issues	\$0.00	\$0.00	\$0.00
00008	Plan Process Issues	\$0.00	\$0.00	\$0.00
00010	Genever US	\$33,189.75	\$102,545.50	\$135,735.25
00011	Genever BVI	\$0.00	\$2,386.50	\$2,386.50
00012	Mahwah Adversary	\$98,916.00	\$313,918.75	\$412,834.75
00013	Golden Spring Adversary	\$90,231.50	\$17,394.00	\$107,625.50
00014	HCHK Adversary	\$355,217.75	\$292,092.50	\$647,310.25
00015	Interpleader Adversary	\$24,050.00	\$792.00	\$24,842.00
00016	Mei Guo Adversary	\$42,793.50	\$53,653.50	\$96,447.00
00017	HK USA Adversary	\$76,657.00	\$95,988.75	\$172,645.75
00018	Bravo Luck Adversary	\$68,595.50	\$6,652.00	\$75,247.50
00019	SN Apartment Adversary	\$1,300.00	\$132.00	\$1,432.00
00020	Greenwich Land Adversary	\$323,941.00	\$411,194.50	\$735,135.50
00022	PAX Adversary	\$0.00	\$0.00	\$0.00
TOTAL		\$1,719,960.00	\$2,006,024.25	\$3,725,984.25

EXHIBIT E

Summary of Actual and Necessary Expenses

Expense Category	July 2023	August 2023	Total Expenses
Airfare (Nicholas Bassett)	\$2,192.51	\$1,127.81	\$3,320.32
Articles and Publications	\$28.35	\$0.00	\$28.35
Attorney Service (Service of Documents):			
- Metro Attorney Service	\$575.00	\$1,150.00	\$1,725.00
Computer Search (Other)	\$769.68	\$944.82	\$1,714.50
Court Reporting Services (Transcripts)	\$0.00	\$3,576.19	\$3,576.19
Filing Fee	\$350.00	\$0.00	\$350.00
Lexis/On Line Search	\$2,007.60	\$3,139.98	\$5,147.58
Local - Meals	\$417.03	\$63.93	\$480.96
Local - Parking	\$19.00	\$0.00	\$19.00
Local - Taxi	\$111.87	\$0.00	\$111.87
Lodging	\$1,750.50	\$0.00	\$1,750.50
Messenger	\$422.20	\$0.00	\$422.20
Outside Professional Services:			
- Divergent Language Solutions	\$0.00	\$1,276.00	\$1,276.00
- Bohonnon Law Firm, LLC	\$3,831.75	\$0.00	\$3,831.75
- UnitedLex	\$93,448.02	\$0.00	\$93,448.02
- Other	\$2,704.50	\$0.00	\$2,704.50
Postage/Express Mail	\$540.22	\$1,641.91	\$2,182.13
Reproduction Charges	\$2,075.52	\$3,236.80	\$5,312.32
Reproduction Charges (Color)	\$272.00	\$151.20	\$423.20
Retrieval of Corporate Documents:			
- TransUnion Risk	\$220.00	\$11.25	\$231.25
- Other	\$90.10	\$0.00	\$90.10
Search Fees	\$1,172.84	\$0.00	\$1,172.84
Taxi/Ground Transportation	\$1,538.02	\$652.37	\$2,190.39
Travel Expense - Internet	\$30.00	\$0.00	\$30.00
Travel Expense - Meals	\$119.17	\$54.10	\$173.27
Travel Expense - Parking	\$172.99	\$43.00	\$215.99
UPS/Courier Service	\$849.98	\$4,407.01	\$5,256.99
Vendor Expense	\$93.00	\$158.87	\$251.87
Westlaw	\$4,799.44	\$3,896.84	\$8,696.28
Westlaw Business	\$4.20	\$0.00	\$4.20
TOTAL	\$120,605.49	\$25,532.08	\$146,137.57

EXHIBIT F

Monthly Fee Statements



PAUL HASTINGS LLP
1117 S California Avenue, Palo Alto, CA 94304-1106
t: +1 650 320 1800 | f: +1 650 320 1900 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho Wan September 7, 2023
Kwok

200 Park Avenue
New York, NY 10166

Please Refer to
Invoice Number: 2369632

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

General Chapter 11 Trustee Representation

PH LLP Client/Matter # 50687-00001
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$362,796.50

Costs incurred and advanced

4,863.56

Current Fees and Costs Due

\$367,660.06

Total Balance Due - Due Upon Receipt

\$367,660.06

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
1117 S California Avenue, Palo Alto, CA 94304-1106
t: +1 650 320 1800 | f: +1 650 320 1900 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho Wan September 7, 2023
Kwok

200 Park Avenue
New York, NY 10166

Please Refer to
Invoice Number: 2369632

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

General Chapter 11 Trustee Representation

PH LLP Client/Matter # 50687-00001
Nicholas A. Bassett

Legal fees for professional services
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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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Luc Despins as Chapter 11 Trustee in the case of Ho Wan September 7, 2023

Kwok

200 Park Avenue
 New York, NY 10166

Please Refer to
 Invoice Number: 2369632

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

General Chapter 11 Trustee Representation

\$362,796.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 Case Administration					
07/03/2023	DM26	Update critical dates calendar and send outlook reminders (.5); review and update working group regarding upcoming filing deadlines (.2)	0.70	540.00	378.00
07/05/2023	DM26	Update critical dates calendar and send outlook reminders (.5); prepare list of filing deadlines for July 2023 (.4); review and update working group regarding upcoming filing deadlines (.2)	1.10	540.00	594.00
07/05/2023	ECS1	Update case issues/task list	1.40	1,015.00	1,421.00
07/05/2023	ECS1	Update trackers regarding upcoming deadlines and critical dates and share with PH working group	0.30	1,015.00	304.50
07/05/2023	JK21	Prepare statement of withdrawal of counsel for electronic filing (0.3); electronically file with the court statement of withdrawal of counsel (0.3)	0.60	540.00	324.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00001
Invoice No. 2369632

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	DM26	Update critical dates calendar and send outlook reminders (.6); review and update working group regarding upcoming filing deadlines (.2)	0.80	540.00	432.00
07/06/2023	ECS1	Update case trackers regarding critical dates and deadlines	0.10	1,015.00	101.50
07/07/2023	DM26	Update critical dates calendar and send outlook reminders (.9); review upcoming filing deadlines and share with working group (.2)	1.10	540.00	594.00
07/10/2023	AB21	Update list of open issues and workstreams	0.20	1,625.00	325.00
07/10/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review upcoming filing deadlines and share with working group (.2)	0.90	540.00	486.00
07/11/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review upcoming filing deadlines and share with working group (.2)	1.00	540.00	540.00
07/11/2023	LAD4	T/c S. Sarnoff (OMM) re: update on case	0.40	1,860.00	744.00
07/12/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review upcoming filing deadlines and share with working group (.2)	0.90	540.00	486.00
07/13/2023	AB21	Correspond with E. Sutton regarding updates to issues/task list	0.10	1,625.00	162.50
07/13/2023	DM26	Update critical dates calendar and send outlook reminders (1.2); review upcoming filing deadlines and share with working group (.2)	1.40	540.00	756.00
07/13/2023	ECS1	Prepare issues/task list regarding matters and deadlines in the Kwok case (2.3); correspond with D. Barron about same (.1); call with S. Maza regarding same (.1)	2.50	1,015.00	2,537.50
07/13/2023	SM29	Correspond with D. Barron re task list and open issues (.1); call with E. Sutton re task list and open issues (.1)	0.20	1,320.00	264.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00001
Invoice No. 2369632

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	AB21	Update call with L. Despins, N. Bassett, A. Luft, D. Barron, S. Maza, W. Farmer, , E. Sutton regarding Kwok case and next steps	2.20	1,625.00	3,575.00
07/14/2023	DM26	Update critical dates calendar and send outlook reminders (.5); review upcoming filing deadlines and share with working group (.2)	0.70	540.00	378.00
07/14/2023	DEB4	Prepare agenda for all hands call regarding pending and upcoming litigation	0.50	1,320.00	660.00
07/14/2023	DEB4	Call with L. Despins, N. Bassett, A. Luft, S. Maza, W. Farmer, , E. Sutton and A. Bongartz regarding litigation plan and related issues/task list	2.20	1,320.00	2,904.00
07/14/2023	ECS1	Call with L. Despins, N. Bassett, A. Bongartz, S. Maza, A. Luft, D. Barron, W. Farmer and regarding upcoming matters in Kwok case, strategy, deadlines	2.20	1,015.00	2,233.00
07/14/2023	ECS1	Continue to prepare issues/task list regarding matters and deadlines in the Kwok case	0.70	1,015.00	710.50
07/14/2023	LAD4	Prepare agenda for team call (.70); handle same with A. Bongartz, N. Bassett, S. Maza, D. Barron, A. Luft, E. Sutton, W. Farmer, re: next steps (2.20)	2.90	1,860.00	5,394.00
07/14/2023	AEL2	Call with L. Despins, N. Bassett, A. Bongartz, S. Maza, D. Barron, W. Farmer, , and E. Sutton regarding Kwok case, strategy, deadlines	2.20	1,625.00	3,575.00
07/14/2023		Call with L. Despins, N. Bassett, A. Bongartz, A. Luft, S. Maza, D. Barron, W. Farmer and E. Sutton regarding pending and upcoming case matters and plan for same	2.20	815.00	1,793.00
07/14/2023	NAB	Call with L. Despins, A. Bongartz, A. Luft, S. Maza, D. Barron, W. Farmer, , E. Sutton regarding litigation tasks and case issues	2.20	1,625.00	3,575.00

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	SM29	Case strategy and update call with E. Sutton, , L. Despina, D. Barron, A. Bongartz, N. Bassett, A Luft	2.20	1,320.00	2,904.00
07/14/2023	WCF	Call with L. Despina, N. Bassett, A. Bongartz, S. Maza, A. Luft, E. Sutton, regarding adversary proceeding litigation plan and upcoming case matters	2.20	1,235.00	2,717.00
07/16/2023	NAB	Correspond with W. Farmer regarding case updates and litigation issues (.3); correspond with L. Despina regarding same (.2)	0.50	1,625.00	812.50
07/17/2023	AB21	Update list of open issues and workstreams	0.30	1,625.00	487.50
07/17/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review upcoming filing deadlines and share with working group (.2)	1.00	540.00	540.00
07/17/2023	ECS1	Call with P. Linsey (NPM) regarding open matters and upcoming deadlines	0.20	1,015.00	203.00
07/17/2023	ECS1	Call with W. Farmer, , and P. Linsey (NPM) regarding adversary proceedings, pending appeals, and related issues/tasks	0.20	1,015.00	203.00
07/17/2023		Call with W. Farmer, P. Linsey and E. Sutton on deadlines and plan for pending adversary proceedings and appeals	0.20	815.00	163.00
07/17/2023	WCF	Correspond with E. Sutton and regarding adversary proceedings, pending appeals and related issues/tasks (.3); call with P. Linsey, , E. Sutton regarding appellate and discovery deadlines (.2)	0.50	1,235.00	617.50
07/18/2023	DM26	Update critical dates calendar and send outlook reminders (.9); review upcoming filing deadlines and share with working group (.2)	1.10	540.00	594.00
07/18/2023	NAB	Correspond with W. Farmer and L. Despina regarding upcoming case matters and strategy issues (.2); review update on pending appeals (.2)	0.40	1,625.00	650.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review upcoming filing deadlines and share with working group (.2)	1.00	540.00	540.00
07/20/2023	AB21	Update list of open issues and workstreams	0.20	1,625.00	325.00
07/20/2023	DM26	Update critical dates calendar and send outlook reminders (.4); review upcoming filing deadlines and share with working group (.2)	0.60	540.00	324.00
07/21/2023	DM26	Update critical dates calendar and send outlook reminders (.3); review upcoming filing deadlines and share with working group (.2)	0.50	540.00	270.00
07/21/2023	JK21	Correspond with E. Sutton regarding certificate of service for template to use with filings	0.20	540.00	108.00
07/24/2023	AB21	Update list of open issues and workstreams	0.10	1,625.00	162.50
07/24/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review upcoming filing deadlines and share with working group (.2)	0.90	540.00	486.00
07/24/2023	LAD4	T/c S. Sarnoff (OMM) re: update	0.40	1,860.00	744.00
07/25/2023	DM26	Update critical dates calendar and send outlook reminders (.7); prepare draft notices of appearance regarding case no. 23cv62 (1.0); review upcoming filing deadlines and share with working group (.2)	1.90	540.00	1,026.00
07/26/2023	DM26	Email W. Farmer re: case no. 23cv102 briefing deadlines (.2); file notices of appearance regarding district court case no. 23mc62 (.7); update critical dates calendar and send outlook reminders (.3); review upcoming filing deadlines and share with working group (.2)	1.40	540.00	756.00
07/27/2023	DM26	Update critical dates calendar and send outlook reminders (.4); review upcoming filing deadlines and share with working group (.2)	0.60	540.00	324.00

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07/28/2023	DM26	Update critical dates calendar and send outlook reminders (1.5); review upcoming filing deadlines and share with working group (.2)	1.70	540.00	918.00
07/30/2023	AB21	Update list of open issues and workstreams	0.20	1,625.00	325.00
07/31/2023	AB21	Update list of open issues and workstreams	0.20	1,625.00	325.00
07/31/2023	DM26	File via the Court's CM/ECF system certain notices of appearance regarding adversary proceeding case no. 23-5018	0.60	540.00	324.00
07/31/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review and share with working group upcoming filing deadlines (.2)	1.00	540.00	540.00
Subtotal: B110 Case Administration			52.00		52,636.50

B113 Pleadings Review

07/03/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in Despins v. Mei Guo case and update working group re same (.1); review related case dockets regarding recent filings (.6)	1.10	540.00	594.00
07/03/2023	DM26	Research certain procedural filings (petitions, joint administration orders, transfer venue order) with regards to Genever Debtors and Ho Wan Kwok chapter 11 cases for	1.50	540.00	810.00
07/05/2023	DM26	Review recent filings in Kwok case and update working group re same (.9); review recent filings in Despins v. Bravo Luck case and Despins v. Mei Guo case and update working group re same (.2); review related case dockets regarding recent filings (.5)	1.60	540.00	864.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (1.0); review recent filings in certain District Court cases and update working group re same (.2); review related case dockets regarding recent filings (.5)	2.30	540.00	1,242.00
07/07/2023	AB21	Review chapter 11 docket update and recent filings	0.20	1,625.00	325.00
07/07/2023	DM26	Review recent filings in Kwok case and update working group re same (.8); review recent filings in certain adversary proceedings and update working group re same (.9); review recent filings in Mei Guo v. Despina Connecticut District Court case and update working group re same (.2); review related case dockets regarding recent filings (.4)	2.30	540.00	1,242.00
07/10/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (.8); review recent filings in Kwok v. Despina District Court case and update working group re same (.2); review related case dockets regarding recent filings (.5)	2.10	540.00	1,134.00
07/11/2023	DM26	Review recent filings in Kwok case and update working group re same (.5); review recent filings in certain adversary proceedings and update working group re same (.3); review recent filings in Greenwich & Ngok v. Despina District Court case and USA v. Kwok case and update working group re same (.4); review additional case documents and prepare same for working group review (.4); review related case dockets re: recent filings (.4)	2.00	540.00	1,080.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in USA v. Kwok case and update working group re same (.3); review related case dockets regarding recent filings (.5)	1.20	540.00	648.00
07/13/2023	AB21	Review chapter 11 docket update and recent filings	0.20	1,625.00	325.00
07/13/2023	DM26	Review recent filings in Kwok case and update working group re same (.9); review recent filings in certain adversary proceedings and update working group re same (.3); review recent filings in USA v. Kwok Second Circuit Court of Appeal case and update working group re same (.1); research certain case documents per attorney request (.6); review additional related case dockets regarding recent filings (.6)	2.50	540.00	1,350.00
07/14/2023	DM26	Review recent filings in Kwok case and update working group re same (.7); review recent filings in certain adversary proceedings and update working group re same (.9); review recent filings in USA v. Kwok case and update working group re same (.1); review related case dockets regarding recent filings (.5)	2.20	540.00	1,188.00
07/17/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and district court cases and update working group re same (.5); review related case dockets regarding recent filings (.5)	1.60	540.00	864.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in Despina v. Mei Guo case and update working group re same (.1); research certain requested case documents (.6); review additional related case dockets regarding recent filings (.5)	1.60	540.00	864.00
07/19/2023	AB21	Review chapter 11 docket update and recent filings	0.10	1,625.00	162.50
07/19/2023	DM26	Review recent filings in Kwok case and update working group re same (.8); review recent filings in certain adversary proceedings and update working group re same (.3); review related case dockets regarding recent filings (.5); review additional case documents and prepare same for working group review (.5)	2.10	540.00	1,134.00
07/20/2023	DM26	Review recent filings in Kwok case and update working group re same (.5); review recent filings in Mei Guo v. Despina District Court case and update working group re same (.1); review related case dockets regarding recent filings (.5)	1.10	540.00	594.00
07/21/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (.4); review related case dockets re: recent filings (.5); research pleadings relating to HK Parties and Vartan on sanctions (.6); correspond with D. Carnelli (NPM) regarding same (.1)	2.20	540.00	1,188.00
07/24/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and district court cases and update working group re same (.6); review related case dockets regarding recent filings (.5)	1.70	540.00	918.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2023	DM26	Review recent filings in Kwok case and update working group re same (.7); review recent filings in certain adversary proceedings and district court cases and update working group re same (.8); review related case dockets regarding recent filings (.5)	2.00	540.00	1,080.00
07/26/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in certain adversary proceedings and district court cases and update working group re same (.7); prepare unredacted exhibits related to case no. 23ap5018 for local counsel (.6); research regarding certain requested case documents (.6); review related case dockets regarding recent filings (.5)	2.80	540.00	1,512.00
07/27/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in certain adversary proceedings and update working group re same (.8); review related case dockets regarding recent filings (.5)	1.70	540.00	918.00
07/28/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and district court cases and update working group re same (.9); review recent filings in USA v. Kwok case and update working group re same (.2); review main case docket and adversary proceeding dockets regarding certain decisions/opinions entered (.8); review related case dockets regarding recent filings (.5)	3.00	540.00	1,620.00
07/31/2023	DM26	Review recent filings in Kwok case and update working group re same (.5); review recent filings in certain adversary proceedings and update working group re same (.6); review related case dockets regarding recent filings (.6)	1.70	540.00	918.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Subtotal: B113 Pleadings Review			40.80		22,574.50

B155 Court Hearings

07/09/2023	DM26	Draft agenda of matters set for 7/11/23 hearing (4.4); correspond with E. Sutton regarding same (.1)	4.50	540.00	2,430.00
07/10/2023	DM26	Prepare reference materials for 7/11/23 hearing	7.30	540.00	3,942.00
07/13/2023	DM26	Prepare draft agenda of matters scheduled for 7/18/23 hearing (4.3); prepare index of reference materials for hearing (.7)	5.00	540.00	2,700.00
07/16/2023	DM26	Update draft agenda of matters set for 7/18/23 hearing	0.40	540.00	216.00
07/17/2023	AB21	Prepare hearing notes for hearing on Epiq fee application (0.6); correspond with L. Despina regarding same (0.1); calls with R. Amporfro (Epiq) regarding hearing prep (0.1)	0.80	1,625.00	1,300.00
Subtotal: B155 Court Hearings			18.00		10,588.00

B160 Fee/Employment Applications

07/05/2023	AB21	Review PH May fee statement (2.6); calls with D. Barron regarding same (0.2); correspond with E. Sutton regarding same (0.1); correspond with K. Catalano regarding same (0.1); correspond with W. Farmer regarding same (0.1); correspond with PH Kwok team (L. Despina, S. Maza, D. Barron, N. Bassett, A. Luft, K. Catalano, W. Farmer, E. Sutton, K. Traxler, J. Kuo) regarding new matter numbers (0.1)	3.20	1,625.00	5,200.00
07/05/2023	DEB4	Conferences with A. Bongartz regarding May fee statement	0.20	1,320.00	264.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	AB21	Review PH March, April, and May fee statements (3.5); correspond with J. Kosciwicz regarding same (0.1); call with S. Maza regarding same (0.3)	3.90	1,625.00	6,337.50
07/06/2023	SM29	Call with A. Bongartz re time entries and new client matter numbers	0.30	1,320.00	396.00
07/07/2023	AB21	Revise PH March, April and May fee statements (2.9); correspond with D. Barron regarding same (0.2); correspond with J. Kosciwicz regarding same (0.1); correspond with K. Catalano regarding same (0.2)	3.40	1,625.00	5,525.00
07/10/2023	AB21	Correspond with D. Barron regarding PH March and April fee statements (0.3); correspond with N. Bassett regarding same (0.1); revise same (0.2)	0.60	1,625.00	975.00
07/11/2023	AB21	Review draft motion for approval of interim compensation procedures (0.4); call with D. Barron regarding time entries for PH March and April fee statements (0.3)	0.70	1,625.00	1,137.50
07/11/2023	DEB4	Conference with A. Bongartz regarding time entries for March and April fee statements	0.30	1,320.00	396.00
07/11/2023	KAT2	Prepare parts of second interim fee application	1.10	1,025.00	1,127.50
07/12/2023	AB21	Revise interim compensation procedures motion (1.8); calls with P. Linsey (Neubert) regarding same (0.3); correspond with P. Linsey and L. Despins regarding same (0.1)	2.20	1,625.00	3,575.00
07/12/2023	AB21	Revise PH March and April time entries (0.4); call with A. Luft regarding same (0.6); correspond with D. Barron regarding same (0.1); correspond with J. Kuo regarding same (0.1); correspond with regarding same (0.1)	1.30	1,625.00	2,112.50
07/12/2023	KAT2	Prepare parts of second interim fee application	0.20	1,025.00	205.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	AEI2	Call with A. Bongartz re: time entries for March and April fee statements	0.60	1,625.00	975.00
07/13/2023	AB21	Correspond with N. Bassett regarding PH fee statements (0.1); revise same (0.1)	0.20	1,625.00	325.00
07/13/2023	AB21	Analyze interim compensation procedures motion (0.7); correspond with L. Despins and P. Linsey (Neubert) regarding same (0.6); call with P. Linsey regarding same (0.1); revise same (0.3)	1.70	1,625.00	2,762.50
07/13/2023	KAT2	Prepare parts of second interim fee application (1.2); prepare response to UST Appendix B questions (.2); correspond with C. Edge regarding information for interim fee application (.1)	1.50	1,025.00	1,537.50
07/13/2023	LAD4	Review/edit interim comp motion	0.60	1,860.00	1,116.00
07/14/2023	KAT2	Prepare parts of second interim fee application, exhibits, supporting declaration, and proposed order (1.6); correspond with A. Bongartz regarding same (.1); correspond with I. Ahmad regarding UST Appendix B information for fee application (.1)	1.80	1,025.00	1,845.00
07/15/2023	AB21	Review PH May fee statement	2.00	1,625.00	3,250.00
07/17/2023	AB21	Review PH May fee statement (0.4); call with A. Luft regarding same (0.2); call with D. Barron regarding same (0.2); correspond with K. Catalano and W. Farmer regarding same (0.1)	0.90	1,625.00	1,462.50
07/17/2023	DEB4	Conference with A. Bongartz regarding May fee statement	0.20	1,320.00	264.00
07/17/2023	KAT2	Review interim compensation motion	0.20	1,025.00	205.00
07/17/2023	AEI2	Call with A. Bongartz re: May fee statement	0.20	1,625.00	325.00
07/19/2023	AB21	Review PH June fee statement	3.10	1,625.00	5,037.50
07/20/2023	AB21	Revise PH June fee statement	2.50	1,625.00	4,062.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	KAT2	Revise PH second interim fee application (1); correspond with I. Ahmad regarding same (1); correspond with A. Bongartz regarding June services and related U.S. Trustee request (1)	0.30	1,025.00	307.50
07/21/2023	AB21	Review PH June fee statement (1.2); calls with D. Barron regarding same (0.3); correspond with A. Luft regarding same (0.4); correspond with N. Bassett regarding same (0.1); correspond with E. Sutton regarding same (0.1); correspond with W. Farmer regarding same (0.1); correspond with C. Edge regarding same (0.2)	2.40	1,625.00	3,900.00
07/21/2023	DEB4	Conference with A. Bongartz regarding June fee statement	0.30	1,320.00	396.00
07/21/2023	AEL2	Correspond with A. Bongartz re: fee application edits	0.40	1,625.00	650.00
07/24/2023	AB21	Prepare parts of PH second interim fee application (3.4); correspond with E. Sutton regarding same (0.1)	3.50	1,625.00	5,687.50
07/25/2023	AB21	Review PH March fee statement (1.7); correspond with L. Despina regarding same (0.1); review PH April fee statement (1.4); correspond with C. Edge regarding fee statements (0.2); call with C. Edge regarding same (0.1); prepare parts of PH second interim fee application (1.8); correspond with D. Barron regarding same (0.4)	5.70	1,625.00	9,262.50
07/25/2023	ECS1	Correspond with A. Bongartz regarding depositions in connection with PH interim fee application	0.20	1,015.00	203.00
07/26/2023	AB21	Review PH March, April, and May 2023 fee statements (1.3); correspond with C. Edge regarding same (0.2); prepare parts of PH second interim fee application (3.4); correspond with E. Sutton regarding same (0.1); call with N. Bassett regarding same (0.1); correspond with D. Barron regarding same (0.1)	5.20	1,625.00	8,450.00

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07/26/2023	DEB4	Analyze fee statements and related documents in connection with preparing interim fee application	4.40	1,320.00	5,808.00
07/26/2023	NAB	Call with A. Bongartz regarding interim fee application (.1); correspond with A. Bongartz regarding same (.2)	0.30	1,625.00	487.50
07/27/2023	AB21	Correspond with L. Despins regarding PH interim fee application (0.3); prepare parts of same (1.9); call with D. Barron regarding same (0.2); correspond with W. Farmer regarding same (0.1); correspond with N. Bassett regarding same (0.1); call and correspond with C. Edge regarding same (0.1); review March, April, and May PH fee statements (1.0); correspond with C. Edge regarding same (0.1)	3.80	1,625.00	6,175.00
07/27/2023	DEB4	Prepare sections of interim fee application	4.80	1,320.00	6,336.00
07/27/2023	DEB4	Conference with A. Bongartz regarding interim fee application	0.20	1,320.00	264.00
07/27/2023	DEB4	Correspond with W. Farmer regarding Jimang Lio lawsuit in connection with fee application	0.10	1,320.00	132.00
07/28/2023	AB21	Revise PH June fee statement (0.8); correspond with C. Edge regarding same (0.1); revise PH interim fee application (0.8); correspond with N. Bassett regarding same (0.1)	1.80	1,625.00	2,925.00
07/28/2023	DEB4	Prepare sections of interim fee application	0.80	1,320.00	1,056.00
07/30/2023	AB21	Prepare parts of PH interim fee application	1.30	1,625.00	2,112.50
07/30/2023	KAT2	Correspond with D. Gonzalez regarding fee matters	0.10	1,025.00	102.50
07/31/2023	AB21	Call with K. Traxler regarding notice of PH rate adjustment (0.1); revise same (0.1); correspond and call with L. Despins regarding same (0.1)	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/31/2023	AB21	Review and prepare parts of PH second interim fee application (1.8); calls with C. Edge regarding same (0.2); correspond with L. Despins regarding same (0.2); correspond with K. Traxler regarding same (0.1); correspond with N. Bassett regarding same (0.1)	2.40	1,625.00	3,900.00
07/31/2023	KAT2	Correspond with D. Gonzalez regarding fee matters (.1); correspond with A. Bongartz regarding same and change in rates (.1); prepare notice of change in rates (.4); call with A. Bongartz regarding same (.1)	0.70	1,025.00	717.50
07/31/2023	NAB	Prepare parts of fee application (1.7); correspond with A. Bongartz regarding same (.1)	1.80	1,625.00	2,925.00
Subtotal: B160 Fee/Employment Applications			73.70		112,703.50

B165 Fee/Employment Applications for Other Professionals

07/03/2023	AB21	Correspond with D. White (EOCS) regarding EOCS invoice	0.10	1,625.00	162.50
07/05/2023	AB21	Correspond with J. Kuo regarding filing of EOCS invoice (0.1); prepare notice regarding same (0.1)	0.20	1,625.00	325.00
07/05/2023	JK21	Prepare for electronic filing notice of filing third invoice of engineering operations (0.2); electronically file with the court notice of filing third invoice of engineering operations (0.3)	0.50	540.00	270.00
07/06/2023	AB21	Call with H. Claiborn (U.S. Trustee) regarding Epiq fee application (0.2); correspond with R. Amporfro (Epiq) regarding same (0.2); correspond with H. Claiborn regarding same (0.3)	0.70	1,625.00	1,137.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	AB21	Correspond with L. Despina regarding Bohannon invoice (0.1); correspond with H. Claiborn (U.S. Trustee) regarding same (0.1)	0.20	1,625.00	325.00
07/10/2023	AB21	Correspond with H. Claiborn (US Trustee) regarding Epiq fee application	0.10	1,625.00	162.50
07/10/2023	JK21	Prepare notice of filing of revised AAGL proposed order (0.4); electronically file with the court notice of filing of revised AAGL proposed order (0.3); prepare additional service of same (0.2)	0.90	540.00	486.00
07/11/2023	LAD4	T/c M. Kennedy (Chilmark) re: forensic accountant role	0.50	1,860.00	930.00
07/13/2023	LAD4	Interview Teneo team as forensic accountant	0.80	1,860.00	1,488.00
07/14/2023	AB21	Correspond with H. Claiborn (U.S. Trustee) regarding retention of Bohannon Law Firm (0.1); calls and correspond with P. Linsey (Neubert) regarding same (0.1); correspond and call with L. Despina regarding same (0.1); correspond with D. Bohannon (Bohannon Law) regarding same (0.1)	0.40	1,625.00	650.00
07/14/2023	DEB4	Correspond with A. Luft regarding investigator retention	0.10	1,320.00	132.00
07/17/2023	AB21	Call with P. Linsey (Neubert) regarding fee applications and next steps (0.3); call with A. Thorp (Harneys Legal) regarding Harneys fee application (0.2)	0.50	1,625.00	812.50
07/17/2023	DEB4	Calls with E. Sutton regarding forensic accountant retention matters	0.20	1,320.00	264.00
07/17/2023	DEB4	Correspond with J. Voss (FRA) regarding forensic accountant retention issues	0.10	1,320.00	132.00
07/17/2023	DEB4	Correspond with A. Luft, N. Bassett and P. Kelker (Risk Advisory) regarding potential retention	0.60	1,320.00	792.00
07/17/2023	ECS1	Prepare parties in interest list for forensic accounting firms (.7); call with D. Barron about same (.1)	0.80	1,015.00	812.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	ECS1	Prepare care package with bank accounts and statements produced in Kwok discovery (.1); correspond with , J. Kuo and D. Barron about same (.1); call with D. Barron about same (.1)	0.30	1,015.00	304.50
07/17/2023	AEL2	Call with Risk Advisory re: potential investigative work	0.70	1,625.00	1,137.50
07/18/2023	AB21	Correspond with L. Despins regarding hearing on Epiq fee application (0.1); call with R. Amporfro (Epiq) regarding same (0.1); correspond with L. Despins regarding same (0.6)	0.80	1,625.00	1,300.00
07/18/2023	ECS1	Prepare care package with bank account/statement information produced in Kwok discovery (.1); correspond with , J. Kuo and D. Barron about same (.1)	0.20	1,015.00	203.00
07/19/2023	ECS1	Prepare care package with (and summarizing) bank accounts and statements produced in Kwok discovery (.1); correspond with UnitedLex about same (.2)	0.30	1,015.00	304.50
07/19/2023	AEL2	Call with J. Voss re: retention and interested parties	0.10	1,625.00	162.50
07/20/2023	AB21	Review draft Bohonnon retention application (0.1); call and correspond with D. Skalka (Neubert) regarding same (0.1)	0.20	1,625.00	325.00
07/21/2023	AB21	Revise Bohonnon retention application (0.3); correspond with L. Despins (0.2); correspond with D. Skalka regarding same (0.1); call with D. Bohonnon (Bohonnon Law) regarding supporting declaration (0.1)	0.70	1,625.00	1,137.50
07/21/2023	JK21	Correspond with E. Sutton regarding documents for forensic accountant	0.30	540.00	162.00
07/24/2023	AB21	Call and correspond with P. Linsey (Neubert) regarding service of Bohonnon retention application	0.10	1,625.00	162.50
07/24/2023	AB21	Call with S. Martinez (Alix) regarding retention of forensic accountant	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023	DEB4	Conference with A. Luft, L. Despins and Kroll regarding potential retention	0.60	1,320.00	792.00
07/24/2023	DEB4	Correspond with E. Esses (Kroll) regarding list of interested parties	0.10	1,320.00	132.00
07/24/2023	ECS1	Correspond with A. Bongartz regarding parties in interest list for Kroll	0.10	1,015.00	101.50
07/24/2023	LAD4	Review/comment on retention of forensic accountants (1.30); interview Kroll re: same with D. Barron and A. Luft (.60)	1.90	1,860.00	3,534.00
07/24/2023	AEL2	Meeting with Kroll, D. Barron, L. Despins re: potential forensic accounting analysis	0.60	1,625.00	975.00
07/31/2023	LAD4	Review/edit forensic accountant retention terms (1.80); t/c S. Sarnoff (OMM) re: same and update (.40); t/c A. Pfeiffer (Kroll) re: final call (.40)	2.60	1,860.00	4,836.00
Subtotal: B165 Fee/Employment Applications for Other Professionals			16.60		24,938.00

B191 General Litigation

07/10/2023	AB21	Review draft motion to extend removal deadline (0.2); correspond with L. Despins regarding same (0.1); correspond with P. Linsey (Neubert) regarding same (0.1)	0.40	1,625.00	650.00
Subtotal: B191 General Litigation			0.40		650.00

B210 Business Operations

07/03/2023	AB21	Correspond with L. Despins and R. Arbuckle (East West Bank) regarding transfer to interest-bearing account	0.20	1,625.00	325.00
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	AB21	Correspond with H. Claiborn (U.S. Trustee) regarding bank accounts and surety bond (0.4); correspond with L. Despins regarding same (0.5); correspond with T. Sadler regarding same (0.1); correspond with T. Sadler regarding same (0.1); call with D. Barron regarding same (0.1)	1.20	1,625.00	1,950.00
07/14/2023	DEB4	Conference with A. Bongartz regarding bank accounts and surety bonds	0.10	1,320.00	132.00
07/17/2023	AB21	Correspond with L. Despins regarding trustee bond (0.1); correspond with T. Sadler regarding same (0.2)	0.30	1,625.00	487.50
07/18/2023	AB21	Correspond with T. Sadler regarding pricing quote for trustee bond (0.2); review related application (0.2)	0.40	1,625.00	650.00
07/18/2023	TS21	Correspond with Levine Company re surety bond premium quote (.3); call with Levine Company re same (.2)	0.50	1,175.00	587.50
07/19/2023	AB21	Correspond with T. Sadler regarding wire transfer for Epiq fees	0.10	1,625.00	162.50
07/20/2023	AB21	Correspond with T. Sadler regarding trustee bond (0.2); correspond with L. Despins regarding same (0.1)	0.30	1,625.00	487.50
07/20/2023	AB21	Correspond with T. Sadler regarding wire transfers for Pullman fees and EOCS fees	0.10	1,625.00	162.50
07/20/2023	TS21	Correspond with A. Bongartz re surety bond (.1); correspond with surety provider re same (.5); review and comment on wire transfer payments to Epiq and payment of Dexter White invoices (.6)	1.20	1,175.00	1,410.00
07/24/2023	AB21	Correspond with T. Sadler regarding update on pricing quote for trustee bond	0.10	1,625.00	162.50
07/24/2023	TS21	Correspond with L. Despins, A. Bongartz and Levine Corporation regarding surety bond quotes	0.30	1,175.00	352.50
07/25/2023	TS21	Correspond with Levine Corporation re surety bond	0.20	1,175.00	235.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	AB21	Correspond with L. Despins regarding trustee bond (0.1); correspond with H. Clayborn (U.S. Trustee) regarding same (0.1)	0.20	1,625.00	325.00
07/28/2023	AB21	Correspond with T. Sadler regarding update on trustee bond	0.10	1,625.00	162.50
07/28/2023	TS21	Correspond with A. Bongartz and L. Despins re surety bond	0.10	1,175.00	117.50
07/31/2023	AB21	Correspond with T. Sadler regarding trustee bond	0.10	1,625.00	162.50
Subtotal: B210 Business Operations			5.50		7,872.00

B211 Financial Reports (Monthly Operating Reports)

07/10/2023	AB21	Correspond with J. Gervais (U.S. Trustee) regarding question regarding April 2023 monthly operating report	0.10	1,625.00	162.50
07/18/2023	DEB4	Correspond with T. Sadler regarding MOR	0.20	1,320.00	264.00
07/19/2023	DEB4	Correspond with T. Sadler regarding MOR (0.2); review same (0.3)	0.50	1,320.00	660.00
07/19/2023	TS21	Prepare June monthly operating report (2.1); correspond with D. Barron re same (.3)	2.40	1,175.00	2,820.00
07/20/2023	TS21	Correspond with L. Despins and D. Mohamed re monthly operating report	0.20	1,175.00	235.00
07/21/2023	DM26	File via the Court's CM/ECF system monthly operating report by Trustee (.1); correspond with local counsel re service of same (.2)	0.30	540.00	162.00
07/31/2023	DEB4	Correspond with L. Despins regarding MOR	0.40	1,320.00	528.00
Subtotal: B211 Financial Reports (Monthly Operating Reports)			4.10		4,831.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B230 Financing/Cash Collections					
07/02/2023	SM29	Review and revise DIP motion from (3.9); email re same (.2)	4.10	1,320.00	5,412.00
07/03/2023	AB21	Correspond with re regarding DIP motion	0.10	1,625.00	162.50
07/03/2023		Prepare parts of DIP motion and incorporate S. Maza comments in same	6.80	915.00	6,222.00
07/03/2023	SM29	Review and revise DIP motion	2.00	1,320.00	2,640.00
07/04/2023		Prepare parts of DIP motion	1.90	915.00	1,738.50
07/05/2023	AC43	Review draft DIP motion for key DIP terms (0.8); call with S. Maza regarding DIP credit agreement and motion (0.3)	1.10	1,725.00	1,897.50
07/05/2023	SM29	Call with A. Cota re DIP credit agreement and motion (.3); prepare notes for same (.1)	0.40	1,320.00	528.00
07/07/2023		Review precedent DIP orders (.4); prepare final DIP order (1.2)	1.60	915.00	1,464.00
07/07/2023	DM26	Research regarding certain precedent DIP orders	0.80	540.00	432.00
07/10/2023	AB21	Correspond with L. Despins regarding interdebtor DIP motion (0.1); conferences with S. Maza regarding same (1.0); correspond with S. Maza regarding same (0.1)	1.20	1,625.00	1,950.00
07/10/2023	SM29	Revise DIP motion (1.3); prepare issues list regarding same (.5); analyze authority re same (.3); conferences with A. Bongartz re same (1.0); correspond with L. Despins re same (.4); correspond with A. Cota re credit agreement (.3)	3.80	1,320.00	5,016.00
07/11/2023	AC43	Review DIP terms and structure (0.9); review precedent credit agreement (0.4); correspond with M. Grabis regarding drafting DIP credit agreement and DIP structure (0.5)	1.80	1,725.00	3,105.00
07/11/2023		Review precedent DIP orders (.4); prepare final DIP order (.7)	1.10	915.00	1,006.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2023	MG21	Correspond with A. Cota regarding DIP financing (.10); correspond with S. Maza regarding same (.10); review DIP terms (.40); review precedent DIP credit agreements (1.1); draft parts of DIP credit agreement (.60)	2.30	1,290.00	2,967.00
07/11/2023	SM29	Correspond with M. Grabis re DIP credit agreement	0.50	1,320.00	660.00
07/12/2023		Continue to prepare draft DIP order	5.90	915.00	5,398.50
07/13/2023		Review and revise draft DIP order (1.5); correspond with S. Maza regarding same (.1)	1.60	915.00	1,464.00
07/13/2023	MG21	Continue to draft DIP credit agreement	2.00	1,290.00	2,580.00
07/14/2023	MG21	Draft parts of DIP credit agreement	1.00	1,290.00	1,290.00
07/14/2023	SM29	Revise DIP motion and order	0.80	1,320.00	1,056.00
07/17/2023	AB21	Review draft inter-debtor DIP motion (0.6); call with S. Maza regarding same (0.4)	1.00	1,625.00	1,625.00
07/17/2023		Correspond with J. Kuo re lien searches (0.2); telephone conference with S. Maza on motion to limit service of DIP motion (0.1)	0.30	915.00	274.50
07/17/2023	ECS1	Correspond with S. Maza regarding motion to limit notice in connection with section 363 motion	0.20	1,015.00	203.00
07/17/2023	JK21	Correspond with S. Maza regarding lien searches for Genever entities (0.2); review and comment on lien searches for Genever entities (0.2)	0.40	540.00	216.00
07/17/2023	MG21	Draft parts of DIP credit agreement	1.50	1,290.00	1,935.00
07/17/2023	SM29	Email J. Kuo re DIP liens search	0.10	1,320.00	132.00
07/17/2023	SM29	Call with A. Bongartz re DIP financing (.4); revise DIP motion and order (.3); email M. Grabis re DIP credit agreement (.2); review leases in connection with same (.5); correspond with E. Sutton re motion to limit service of DIP motion (.1); call with re same (.1)	1.60	1,320.00	2,112.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023		Draft motion to limit service of the DIP motion and corresponding proposed order	2.80	915.00	2,562.00
07/18/2023	MG21	Draft parts of DIP credit agreement (1.00); correspond with S. Maza regarding same (.30); correspond with A. Cota and S. Maza regarding draft credit agreement (.20)	1.50	1,290.00	1,935.00
07/18/2023	SM29	Preliminary review of DIP credit agreement (.3); email M. Grabis re same and security agreement (.1)	0.40	1,320.00	528.00
07/18/2023	SM29	Correspond with re DIP motion and service of DIP motion (.2); respond to email from M. Grabis re DIP motion (.1)	0.30	1,320.00	396.00
07/19/2023	AB21	Call with S. Maza regarding interdebtor DIP motion	0.30	1,625.00	487.50
07/19/2023	AC43	Review and comment on DIP credit agreement (1.1); review DIP motion in connection with same (0.7)	1.80	1,725.00	3,105.00
07/19/2023	MG21	Review credit agreement (.90); related correspondence with S. Maza (.30)	1.20	1,290.00	1,548.00
07/19/2023	SM29	Review DIP credit agreement (3.0); call with A. Bongartz re same and DIP motion (.3); correspond with M. Grabis re same (.2); review lease documents in connection with security agreement (.5); analyze authority re same (1.7); correspond with A. Bongartz re same (.2); email L. Despins re same (.2); revise DIP motion and order (1.1)	7.20	1,320.00	9,504.00
07/20/2023	AB21	Call with S. Maza regarding interdebtor DIP motion (0.2); correspond with S. Maza regarding same (0.1)	0.30	1,625.00	487.50
07/20/2023	AC43	Review changes to DIP credit agreement and provide comments on same (.30); analyze DIP credit agreement issues (1.10); correspond with M. Grabis regarding same (.20)	1.60	1,725.00	2,760.00
07/20/2023		Revise motion to limit service of DIP motion	0.80	915.00	732.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	LAD4	Review/edit DIP motion (1.20); t/c S. Maza re: same (.30)	1.50	1,860.00	2,790.00
07/20/2023	MG21	Prepare parts of DIP credit agreement (2.4); related correspondence with A. Cota and S. Maza (.30)	2.70	1,290.00	3,483.00
07/20/2023	SM29	Call with L. Despins re DIP motion comments and restructuring (.3); email re insurance coverage in connection with same (.1); revise DIP motion to incorporate L. Despins comments (1.9); email L. Despins re same and open issues (.1); review and revise motion to limit service of DIP motion (.5); email re same (.1); revise DIP motion to incorporate further comments from L. Despins (.5); call with A. Bongartz re same (.2); review revised DIP credit agreement (.3); correspond with M. Grabis re same (.1); email L. Despins re updated DIP motion and proxy (.1)	4.20	1,320.00	5,544.00
07/21/2023		Review Sherry Netherland related documents	1.30	915.00	1,189.50
07/21/2023		Review Sherry Netherland documents related to maintenance fund	0.50	915.00	457.50
07/21/2023	LAD4	Review/edit re-draft of DIP motion and analyze open issues re: same (3.10); t/c S. Sarnoff, P. Friedman (OMM) & I. Goldman (Pullman) re: DIP financing issues (.50)	3.60	1,860.00	6,696.00
07/21/2023	MG21	Review and revise DIP credit agreement (1.20); related correspondence with S. Maza (.30)	1.50	1,290.00	1,935.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/21/2023	SM29	Revise DIP motion (.5); revise DIP credit agreement and DIP order (2.2); further revise DIP motion to incorporate comments from L. Despins (.2); email L. Despins re same and motion to limit notice re same (.1); correspond with M. Grabis re DIP credit agreement (.2); correspond with re DIP liens and borrower accounts (.3); correspond with A. Bongartz re same (.1); correspond with D. Barron re same (.2); email B. Langer re same (.2); analyze authority re same (1.0)	5.00	1,320.00	6,600.00
07/22/2023	AB21	Correspond with L. Despins regarding interdebtor DIP motion (0.1); review same (0.3); correspond with S. Sarnoff (O'Melveny) and I. Goldman (Pullman) regarding same (0.1)	0.50	1,625.00	812.50
07/22/2023	AC43	Review revised DIP credit agreement (.70); correspond with M. Grabis on same (.20)	0.90	1,725.00	1,552.50
07/24/2023	AB21	Call with L. Despins, S. Maza regarding interdebtor DIP (0.4); review power of attorney related to same (0.2); correspond with C. Abrehart (Genever BVI director) regarding same (0.1)	0.70	1,625.00	1,137.50
07/24/2023	JK21	Correspond with M. Grabis and S. Maza regarding lien search results	0.20	540.00	108.00
07/24/2023	LAD4	T/c S. Maza, A. Bongartz and C. Abrehart (Genever BVI director) re: DIP financing	0.40	1,860.00	744.00
07/24/2023	MG21	Review lien searches (.1); review updated DIP credit agreement (.2); correspond with S. Maza and A. Cota regarding same (.1)	0.40	1,290.00	516.00
07/24/2023	SM29	Call with L. Despins, A. Bongartz, C. Abrehart (Genever BVI director) re DIP financing (.4); review and comment on power of attorney in connection with same (.3); correspond with A. Bongartz re DIP (.2)	0.90	1,320.00	1,188.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023	SM29	Review DIP credit agreement and proposed order (1.3); correspond with M. Grabis and J. Kuo re lien searches (.2)	1.50	1,320.00	1,980.00
07/25/2023	AB21	Correspond with S. Maza regarding update on interdebtor DIP motion (0.1); correspond with I. Goldman (Pullman) regarding same (0.1); correspond with P. Friedman (O'Melveny) regarding same (0.1)	0.30	1,625.00	487.50
07/26/2023	AB21	Correspond with S. Millman (Stroock) regarding interdebtor DIP motion (0.1); call with S. Maza regarding same and DIP order (0.1)	0.20	1,625.00	325.00
07/26/2023	SM29	Revise DIP motion in connection with applicable legal standard (.6); analyze authority re same (.4); email L. Despins re same (.2); call with A. Bongartz re DIP motion and order (.1)	1.30	1,320.00	1,716.00
07/27/2023	AB21	Call with S. Maza regarding update on interdebtor DIP motion	0.10	1,625.00	162.50
07/27/2023		Review and revise DIP financing motion and DIP order	3.20	915.00	2,928.00
07/27/2023	MG21	Correspond with S. Maza regarding DIP credit agreement	0.10	1,290.00	129.00
07/27/2023	SM29	Call with A. Bongartz re DIP motion (.1); email , M. Grabis re same (.1)	0.20	1,320.00	264.00
07/28/2023		Review and revise motion to limit service, DIP credit agreement, DIP motion and DIP order	1.60	915.00	1,464.00
07/31/2023	AB21	Call with L. Despins and S. Millman (Stroock) regarding interdebtor DIP (0.7); correspond with S. Maza regarding same (0.3); analyze related issues (0.3); correspond with L. Despins regarding same (0.1)	1.40	1,625.00	2,275.00
07/31/2023	LAD4	T/c S. Millman (S-N counsel) and A. Bongartz re: DIP financing	0.70	1,860.00	1,302.00
07/31/2023	MG21	Correspond with A. Bongartz regarding updates to DIP credit agreement	0.20	1,290.00	258.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Subtotal: B230 Financing/Cash Collections			99.20		125,576.50

B310 Claims Administration and Objections

07/10/2023	JK21	Correspond with E. Sutton regarding asserted claims	0.30	540.00	162.00
07/12/2023	DEB4	Correspond with R. Amporfro (Epiq) regarding claims register	0.10	1,320.00	132.00
07/12/2023	DEB4	Correspond with A. Bongartz regarding claims register	0.10	1,320.00	132.00
Subtotal: B310 Claims Administration and Objections			0.50		426.00

Total	310.80	362,796.50
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	16.30	1,860.00	30,318.00
AC43	Alex Cota	Partner	7.20	1,725.00	12,420.00
NAB	Nicholas A. Bassett	Partner	5.20	1,625.00	8,450.00
AEL2	Luft, Avi E.	Of Counsel	4.80	1,625.00	7,800.00
AB21	Alex Bongartz	Of Counsel	70.90	1,625.00	115,212.50
KAT2	Katherine A. Traxler	Of Counsel	5.90	1,025.00	6,047.50
DEB4	Douglass E. Barron	Associate	17.10	1,320.00	22,572.00
SM29	Shlomo Maza	Associate	37.00	1,320.00	48,840.00
MG21	Maria Grabis	Associate	14.40	1,290.00	18,576.00
WCF	Will C. Farmer	Associate	2.70	1,235.00	3,334.50
TS21	Tess Sadler	Associate	4.90	1,175.00	5,757.50
ECS1	Ezra C. Sutton	Associate	9.70	1,015.00	9,845.50
		Associate	29.40	915.00	26,901.00

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		Associate	2.40	815.00	1,956.00
DM26	David Mohamed	Paralegal	79.50	540.00	42,930.00
JK21	Jocelyn Kuo	Paralegal	3.40	540.00	1,836.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/05/2023	Photocopy Charges	96.00	0.08	7.68
07/05/2023	Photocopy Charges	120.00	0.08	9.60
07/07/2023	Photocopy Charges	792.00	0.08	63.36
07/07/2023	Photocopy Charges	120.00	0.08	9.60
07/10/2023	Photocopy Charges	264.00	0.08	21.12
07/10/2023	Photocopy Charges	429.00	0.08	34.32
07/10/2023	Photocopy Charges (Color)	1,264.00	0.20	252.80
07/11/2023	Photocopy Charges	3,186.00	0.08	254.88
07/11/2023	Photocopy Charges (Color)	96.00	0.20	19.20
07/17/2023	Photocopy Charges	146.00	0.08	11.68
07/17/2023	Photocopy Charges	171.00	0.08	13.68
07/17/2023	Photocopy Charges	49.00	0.08	3.92
07/31/2023	Photocopy Charges	636.00	0.08	50.88
07/01/2023	Computer Search (Other)			3.42
07/03/2023	Lexis/On Line Search			28.09
07/03/2023	Lexis/On Line Search			80.85
07/03/2023	Westlaw			16.96
07/03/2023	Computer Search (Other)			19.80
07/04/2023	Computer Search (Other)			0.09
07/05/2023	Postage/Express Mail - First Class - US;			14.40
07/05/2023	Postage/Express Mail - First Class - US;			30.24
07/05/2023	Computer Search (Other)			13.95
07/06/2023	Computer Search (Other)			10.08
07/07/2023	Postage/Express Mail - First Class - US;			30.24

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07/07/2023	Postage/Express Mail - First Class - US;	30.24
07/07/2023	Computer Search (Other)	28.89
07/09/2023	Computer Search (Other)	4.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ; HCHK Technologies, Inc; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630197266006 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ; HCHK Technologies, Inc; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630192119602 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; SARI B PLACONA ESQ; HCHK Technologies, Inc.,; 75 Livingston Avenue, 2nd Floor; ROSELAND, NJ 070683737 ; 1ZA6T1630191440793 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; PRIYA CHAUDHRY; c/o ChaudhryLaw PLLC; 147 W. 25th St. 12th Fl; NEW YORK, NY 100017229 ; 1ZA6T1630192403812 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ; BRIAN W. HOFMEISTER; 3131 Princeton Pike; LAWRENCEVILLE, NJ 086482201 ; 1ZA6T1630192771380 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; Alex Lipman; Yanping "Yvette" Wang; c/o Lipman Law PLLC; NEW YORK, NY 100017229 ; 1ZA6T1630198975819 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; BRIAN W. HOFMEISTER; Cole Schotz P.C. Attn Ryan Jareck; 1325 Avenue of the Americas; New York, NY 100196026 ; 1ZA6T1630199621789 (MAN)	23.59

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ANTHONY DIBATTISTA; c/o Morvillo Abramowitz Grand Jason; & Anello PC; NEW YORK, NY 100172413 ; 1ZA6T1630197790832 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; Officer, Managing Ge; HCHK Property Management, Inc.; 1209 Orange Street; Wilmington, DE 198011120 ; 1ZA6T1630195775997 (MAN)	23.59
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ; Joshua I. Sherman, Esq.; 10 Mohawk Drive; Livingston, NJ 070393112 ; 1ZA6T1630193529426 (MAN)	30.28
07/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163283; 07/10/2023; ; ANTHONY DIBATTISTA; 45 PARK HILL DR.; HOPEWELL JUNCTION, NY 125335607 ; 1ZA6T1630196109428 (MAN)	36.62
07/10/2023	Postage/Express Mail - First Class - US;	26.91
07/10/2023	Postage/Express Mail - First Class - US;	38.16
07/10/2023	Computer Search (Other)	26.46
07/11/2023	Messenger - Requested by Shlomo Maza; City Expeditor Inc. (USD)(JPMSUA); Invoice # 97695 dated 07/16/2023; From: Paul Hastings Llp; To: Connecticut Bankruptcy Court 915 Lafayette Blvd Bridgeport Ct 06604; Order # 1577183 dated 7/11/2023 14:09	422.20
07/11/2023	Computer Search (Other)	32.76
07/12/2023	Computer Search (Other)	10.71
07/13/2023	Computer Search (Other)	178.74
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; SARI B PLACONA; HCHK ENTITIES; 75 Livingston Avenue, 2nd Floor; ROSELAND, NJ 070683737 ; 1ZA6T1630194473163 (MAN)	23.59

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07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; OFFICER MANAGING GEN; HCHK Technologies, Inc.; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630193527777 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; JEREMY H TEMKIN; c/o Morvillo Abramowitz Grand Iason; 565 Fifth Avenue; NEW YORK, NY 100172413 ; 1ZA6T1630190060008 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; OFFICER MANAGING GEN; Corporation Trust Center; 1209 Orange Street; WILMINGTON, DE 198011120 ; 1ZA6T1630198351251 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; ; BRIAN W. HOFMEISTER; 3131 PRINCETON PIKE; LAWRENCEVILLE, NJ 086482201 ; 1ZA6T1630194719951 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; ; RYAN T JARECK ESQ; 1325 Avenue of the Americas; NEW YORK, NY 100196079 ; 1ZA6T1630199166245 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; ALEX LIPMAN; c/o Lipman Law PLLC; 147 W. 25th St. 12th Fl; NEW YORK, NY 100017229 ; 1ZA6T1630190759782 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; PRIYA CHAUDHRY; c/o ChaudhryLaw; 147 W. 25th St. 12th Fl; NEW YORK, NY 100017229 ; 1ZA6T1630198884677 (MAN)	23.59

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; OFFICER MANAGING GEN; Lexington Property and Staffing, In; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630198856064 (MAN)	23.59
07/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163293; 07/14/2023; ; ANTHONY DIBATTISTA; 45 Park Hill Dr.; HOPEWELL JUNCTION, NY 125335607 ; 1ZA6T1630193885194 (MAN)	36.62
07/14/2023	Postage/Express Mail - First Class - US;	20.67
07/14/2023	Computer Search (Other)	25.92
07/15/2023	Computer Search (Other)	6.84
07/16/2023	Computer Search (Other)	2.25
07/17/2023	Westlaw	260.83
07/17/2023	Computer Search (Other)	9.81
07/18/2023	Search Fee - SPI Corporate Solutions, Inc., Invoice# 104026 Dated 07/18/23, Lien searches regarding Genever Holdings Corporation and Genever Holdings LLC	1,159.00
07/18/2023	Local - Meals - Shlomo Maza; 07/10/2023; Restaurant: Sandwich Bar; City: Flushing; Dinner; Number of people: 1; Dinner expense working late on case issues	27.77
07/18/2023	Computer Search (Other)	12.60
07/19/2023	Computer Search (Other)	26.55
07/20/2023	Lexis/On Line Search	56.17
07/20/2023	Postage/Express Mail - Express Mail;	28.75
07/20/2023	Westlaw	336.22
07/20/2023	Computer Search (Other)	17.01
07/21/2023	Computer Search (Other)	11.16
07/23/2023	Computer Search (Other)	5.94
07/24/2023	Computer Search (Other)	15.93

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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07/25/2023	Westlaw	159.63
07/25/2023	Computer Search (Other)	16.20
07/26/2023	Westlaw	23.78
07/26/2023	Computer Search (Other)	20.88
07/27/2023	Computer Search (Other)	51.57
07/28/2023	Local - Taxi - Shlomo Maza; 07/19/2023; From/To: Office/Home ; Service Type: Uber; Time: 20:12; working late on matter	78.13
07/28/2023	Computer Search (Other)	83.52
07/29/2023	Computer Search (Other)	9.27
07/30/2023	Computer Search (Other)	8.10
07/31/2023	Postage/Express Mail - First Class - US;	60.42
Total Costs incurred and advanced		\$4,863.56
Current Fees and Costs		\$367,660.06
Total Balance Due - Due Upon Receipt		\$367,660.06



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369633

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Asset Recovery Investigation and Litigation

PH LLP Client/Matter # 50687-00002
Nicholas A. Bassett

Legal fees for professional services for the period ending July 31, 2023	\$219,121.50
Costs incurred and advanced	101,630.32
Current Fees and Costs Due	\$320,751.82
Total Balance Due - Due Upon Receipt	\$320,751.82

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369633

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Asset Recovery Investigation and Litigation

PH LLP Client/Matter # 50687-00002
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$219,121.50

Costs incurred and advanced

101,630.32

Current Fees and Costs Due

\$320,751.82

Total Balance Due - Due Upon Receipt

\$320,751.82

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
 200 Park Avenue, New York, NY 10166-3205
 t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369633

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Asset Recovery Investigation and Litigation

\$219,121.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B120 Asset Analysis and Recovery					
07/13/2023	LAD4	Call with UBS team and Herbert Smith, Pallas (Richardson) re: next steps in UK litigation	0.50	1,860.00	930.00
Subtotal: B120 Asset Analysis and Recovery			0.50		930.00
B155 Court Hearings					
07/08/2023	ECS1	Correspond with D. Mohamed regarding agenda for 7/11/23 hearing	0.20	1,015.00	203.00
07/08/2023	NAB	Prepare outline for June 12, 2023 hearing	0.20	1,625.00	325.00
07/09/2023	ECS1	Prepare agenda for 7/11/23 hearing	0.30	1,015.00	304.50
07/10/2023	ECS1	Prepare cheat sheet summarizing information regarding Hudson Diamond entities and their connection to Mei Guo for the 7/11/23 hearing (1.4); correspond with D. Barron about same (.1)	1.50	1,015.00	1,522.50

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2023	AB21	Correspond with L. Despina regarding reference materials for July 12, 2023 hearing (0.1); correspond with J. Kuo regarding same (0.1)	0.20	1,625.00	325.00
07/11/2023	ECS1	Prepare hearing notes for July 11, 2023 hearing on Zeisler & Zeisler's motion to withdraw as counsel to Hudson Diamond NY	0.70	1,015.00	710.50
07/11/2023	AE12	Attend Zeisler Hudson Diamond motion to withdraw hearing	1.50	1,625.00	2,437.50
07/13/2023	ECS1	Prepare agenda for 7/18/23 hearing regarding GTV and Saraca	0.20	1,015.00	203.00
07/13/2023	ECS1	Review certain submissions to prepare for 7/18/23 hearings and pretrial conference in Kwok case	0.40	1,015.00	406.00
07/14/2023	DM26	Update draft 7/18/23 hearing agenda (.2); prepare reference materials for hearing regarding rule 2004 motion to compel as it pertains to GTV, Saraca and attorney Mitchell (.5)	0.70	540.00	378.00
07/17/2023	DM26	Prepare reference materials for hearing regarding GTV, Saraca and Mitchell (1.5); correspond with E. Sutton regarding same (.3); prepare supplemental reference materials regarding HCHK for 7/18/23 hearing (.7)	2.50	540.00	1,350.00
07/17/2023	ECS1	Review documents and evidentiary issues for 7/18/23 hearings and pretrial conference in Kwok case	0.90	1,015.00	913.50
07/18/2023	DEB4	Conference with E. Sutton regarding 7/18/23 hearing, pending and upcoming discovery, and forensic accountant care package	0.30	1,320.00	396.00
07/18/2023	AE12	Attend hearing re: GTV and Saraca	2.20	1,625.00	3,575.00
Subtotal: B155 Court Hearings			11.80		13,049.50

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/05/2023	NAB	Assess pending litigation	0.20	1,625.00	325.00
07/07/2023	JK21	Update appeals tracking chart	0.40	540.00	216.00
07/07/2023	AEL2	Call with N. Bassett re: upcoming arguments in pending adversary proceedings and open litigation matters	0.40	1,625.00	650.00
07/07/2023	NAB	Call with A. Luft regarding Bravo Luck, Greenwich Land, HCHK, and case issues	0.40	1,625.00	650.00
07/10/2023	AB21	Correspond with L. Despina regarding hearsay rulings in Kwok case	0.20	1,625.00	325.00
07/11/2023	AEL2	Meet with N. Bassett re: discovery and litigation plan for upcoming matters	0.50	1,625.00	812.50
07/11/2023	NAB	Conference with A. Luft regarding strategic issues related to pending discovery and adversary proceedings	0.50	1,625.00	812.50
07/12/2023	NAB	Correspond with A. Luft regarding open litigation issues, discovery, and next steps in Greenwich Land and Mei Guo adversary proceedings	0.20	1,625.00	325.00
07/13/2023	JK21	Update appeals tracking chart	0.90	540.00	486.00
07/15/2023	NAB	Review email from W. Farmer regarding appellate briefing and deadlines	0.30	1,625.00	487.50
07/15/2023	WCF	Review appellate dockets regarding July and August briefing deadlines (.2); call with P. Linsey (NPM) regarding same (.2); correspond with N. Bassett and P. Linsey regarding upcoming appellee briefs (.4)	0.80	1,235.00	988.00
07/15/2023	WCF	Correspond with E. Sutton and regarding current adversary proceeding deadlines and discovery planning	0.30	1,235.00	370.50
07/18/2023	DEB4	Correspond with A. Luft and N. Bassett regarding foreign judgment enforcement issue	0.10	1,320.00	132.00
07/18/2023		Prepare issues/task list regarding pending adversary proceedings	0.80	815.00	652.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	AEL2	Correspond with N. Bassett regarding discovery and plan re: outstanding motions	0.80	1,625.00	1,300.00
07/21/2023	JK21	Update appeals tracking chart	0.40	540.00	216.00
07/24/2023	ECS1	Call with W. Farmer and P. Linsey (NPM) regarding upcoming adversary proceeding and appellate filing/hearing dates and deadlines	0.30	1,015.00	304.50
07/24/2023	WCF	Call with P. Linsey (NPM), E. Sutton regarding issues/task list for adversary proceedings and appeals (.3); analyze certain issues discussed for next steps (.3)	0.60	1,235.00	741.00
07/31/2023	ECS1	Call with and P. Linsey (NPM) regarding upcoming adversary proceeding and appeal filing deadlines	0.10	1,015.00	101.50
07/31/2023	JK21	Update appeals tracking chart	0.40	540.00	216.00
07/31/2023	AEL2	Correspond with N. Bassett re: discovery plan	0.60	1,625.00	975.00
07/31/2023		Prepare litigation issues/task list for pending adversary proceedings (.9); call with E. Sutton and P. Linsey (NPM) regarding same (.1)	1.00	815.00	815.00
07/31/2023	NAB	Correspond with A. Luft regarding litigation issues/task list (.4); review updates on appeals and pending litigation matters (.2)	0.60	1,625.00	975.00
Subtotal: B191 General Litigation			10.80		12,876.00

B195 Non-Working Travel

07/11/2023	NAB	Non-working travel from WDC to Connecticut for M. Levine deposition (Bill at 1/2 rate)	1.50	812.50	1,218.75
07/12/2023	NAB	Non-working travel from New York to WDC after M. Levine deposition (Bill at 1/2 rate)	1.40	812.50	1,137.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	AEL2	Travel back to NY from hearing in CT (Bill at 1/2 rate)	2.30	812.50	1,868.75
Subtotal: B195 Non-Working Travel			5.20		4,225.00

B210 Business Operations

07/18/2023	AB21	Call with D. Johnson (Edmiston) regarding update on Lady May II and next steps (0.1); analyze same (0.1)	0.20	1,625.00	325.00
07/18/2023	AB21	Correspond with R. Stockil (Yachtzoo) regarding open invoice	0.20	1,625.00	325.00
07/20/2023	AB21	Review application for customs bond for Lady May 2 (0.6); call with D. Bohonnon regarding same (0.2); call with J. Reynolds (Jay Reynolds) and D. Bohonnon regarding same (0.2); correspond with L. Despins regarding same (0.1); correspond with D. Johnson (Edmiston) regarding same (0.1); correspond with J. Reynolds regarding same (0.1)	1.30	1,625.00	2,112.50
07/24/2023	AB21	Review Newport dockage fee statement	0.10	1,625.00	162.50
07/28/2023	AB21	Correspond with R. Stockil (Yachtzoo) regarding Yachtzoo invoice	0.10	1,625.00	162.50
07/31/2023	AB21	Correspond with L. Despins regarding update on Lady May II (0.1); correspond with R. Stockil (Yachtzoo) regarding open invoices (0.1)	0.20	1,625.00	325.00
Subtotal: B210 Business Operations			2.10		3,412.50

B261 Investigations

07/02/2023		Prepare summary of informant's email regarding Kwok's associates and activities	1.30	815.00	1,059.50
07/03/2023	DM26	Research regarding certain potential Rule 2004 targets	1.70	540.00	918.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/03/2023	DEB4	Correspond with A. Luft regarding U.S. Trustee filing on Hudson Diamond	0.30	1,320.00	396.00
07/03/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 requests and subpoenas	0.70	1,015.00	710.50
07/05/2023	DEB4	Correspond with informant email regarding	0.10	1,320.00	132.00
07/05/2023	DEB4	Conference with A. Luft and E. Sutton regarding Hudson Diamond and Zeisler withdrawal as counsel	0.40	1,320.00	528.00
07/05/2023	DEB4	Correspond with A. Luft regarding 3 Columbus items	0.20	1,320.00	264.00
07/05/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 requests and subpoenas	0.30	1,015.00	304.50
07/05/2023	ECS1	Call with C. Fornos (Pillsbury), A. Luft, and W. Farmer regarding G Club operations rule 2004 production and concerns relating to confidentiality (.3); review issues and notes to prepare for same (.1); follow up call with A. Luft and W. Farmer regarding same (.1)	0.50	1,015.00	507.50
07/05/2023	ECS1	Meet and confer call with P. Pileggi (Arent Fox), A. Luft in connection with Yossi Almani's rule 2004 requests (.4); follow up call with A. Luft regarding same (.1)	0.50	1,015.00	507.50
07/05/2023	ECS1	Prepare statement and reservation of rights in connection with Zeisler's motion to withdraw as Hudson Diamond NY's counsel (1.7); call with A. Luft and D. Barron re same (.4)	2.10	1,015.00	2,131.50
07/05/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.50	1,015.00	507.50
07/05/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/05/2023	AEL2	Call with D. Barron and E. Sutton re: responsive filing re: rule 2004/Hudson Diamond withdrawal	0.40	1,625.00	650.00
07/05/2023	AEL2	Correspond with D. Barron re: outstanding rule 2004 investigative requests and next steps	0.30	1,625.00	487.50
07/05/2023	AEL2	Revise reply re: Hudson Diamond rule 2004 motion	0.80	1,625.00	1,300.00
07/05/2023	AEL2	Meet and confer with counsel for G Club (C. Fornos, Pillsbury), E. Sutton, and W. Farmer regarding G Club rule 2004 requests and confidentiality (.3); follow up call with W. Farmer, E. Sutton regarding same (.1)	0.40	1,625.00	650.00
07/05/2023	AEL2	Prepare notes for meet and confer with Y. Almani	0.10	1,625.00	162.50
07/05/2023	AEL2	Meet and confer with counsel for Y. Almani (P. Pileggi, Arent Fox), E. Sutton in connection with rule 2004 requests (.4); follow up call with E. Sutton regarding same (.1)	0.50	1,625.00	812.50
07/05/2023	AEL2	Analyze and summarize rule 2004 meetings with Y. Almani, G Club	1.20	1,625.00	1,950.00
07/05/2023		Prepare summary of information relating to Kwok's drivers, bodyguards and key associates provided by informant	0.60	815.00	489.00
07/05/2023	NAB	Email with A. Luft and L. Despins regarding Hudson Diamond discovery issues and related motion to withdraw as counsel (.3); review U.S. Trustee response to same (.1); prepare parts of outline for M. Levine rule 2004 deposition (.7)	1.10	1,625.00	1,787.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/05/2023	WCF	Attend call with C. Fornos (GClub), E. Sutton, A. Luft regarding motion to compel compliance with Rule 2004 subpoena (.3); follow-up call with E. Sutton and A. Luft regarding same (.1); analyze G-Club and HCHK Master Services agreement regarding Rule 2004 data issues (.5); correspond with A. Luft and E. Sutton regarding HCHK Master Services agreement (.1)	1.00	1,235.00	1,235.00
07/06/2023	ECS1	Review information and update notes regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.30	1,015.00	304.50
07/06/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.50	1,015.00	507.50
07/06/2023	ECS1	Prepare sixth supplemental omnibus rule 2004 motion (.4); correspond with D. Barron and A. Luft about same (.1)	0.50	1,015.00	507.50
07/06/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 requests and subpoenas	0.40	1,015.00	406.00
07/06/2023	AEL2	Correspond with R. Connelly and N. Bassett re: ACASS rule 2004 information	0.40	1,625.00	650.00
07/06/2023	AEL2	Correspond with E. Sutton re: Cao rule 2004 discovery	0.20	1,625.00	325.00
07/07/2023	DEB4	Correspond with A. Luft regarding forensic accountant	0.10	1,320.00	132.00
07/07/2023	ECS1	Prepare topic outline for M. Levine Rule 2004 deposition	0.90	1,015.00	913.50
07/07/2023	AEL2	Correspond with N. Bassett re: potential RICO claims	0.30	1,625.00	487.50
07/07/2023		Review information related to Kwok's operations and associates sent by informants	0.70	815.00	570.50
07/07/2023	NAB	Review key documents for M. Levine rule 2004 deposition (.3); email with E. Sutton regarding same (.1)	0.40	1,625.00	650.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/2023	ECS1	Review and prepare documents for M. Levine Rule 2004 deposition	0.20	1,015.00	203.00
07/08/2023	NAB	Review documents related to Hudson Diamond discovery dispute (.2); continue to review key documents for M. Levine rule 2004 deposition (.4)	0.60	1,625.00	975.00
07/09/2023	AEL2	Analyze supporting papers and exhibits re: Hudson Diamond motion	0.90	1,625.00	1,462.50
07/09/2023	AEL2	Analyze proposed RICO claim	0.40	1,625.00	650.00
07/09/2023	NAB	Correspond with A. Luft regarding hearing on Hudson Diamond discovery (.1); review submissions relating to same (.4); prepare parts of outline for M. Levine rule 2004 deposition (1.2); email with E. Sutton and W. Farmer regarding same and topics for same (.6); email with M. Levine regarding same (.2)	2.50	1,625.00	4,062.50
07/10/2023	DEB4	Review and prepare documents for Hudson Diamond hearing	0.50	1,320.00	660.00
07/10/2023	DEB4	Correspond with A. Luft regarding Hudson Diamond documents and Zeisler motion to withdraw as counsel	0.10	1,320.00	132.00
07/10/2023	DEB4	Conference with A. Luft regarding Hudson Diamond issues and Zeisler motion to withdraw as counsel	0.60	1,320.00	792.00
07/10/2023	DEB4	Conferences with E. Sutton regarding Hudson Diamond issues and Zeisler motion to withdraw as counsel	0.40	1,320.00	528.00
07/10/2023	DEB4	Analyze Hudson Diamond/Zeisler withdrawal documents	0.80	1,320.00	1,056.00
07/10/2023	ECS1	Review and summarize transcripts in connection with Zeisler & Zeisler's motion to withdraw as counsel to Hudson Diamond NY (.9); prepare documents and hearing notes for 7/11/23 hearing regarding same (2.0); calls with D. Barron about same (.4); correspond with D. Mohamed about same (.2)	3.50	1,015.00	3,552.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/10/2023	ECS1	Prepare exhibits for M. Levine rule 2004 deposition	0.10	1,015.00	101.50
07/10/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.60	1,015.00	609.00
07/10/2023	AEL2	Call with D. Barron re: arguments related to Zeisler Hudson Diamond withdrawal	0.60	1,625.00	975.00
07/10/2023	AEL2	Correspond with N. Bassett re: Zeisler Hudson Diamond withdrawal arguments	0.20	1,625.00	325.00
07/10/2023	AEL2	Analyze submissions related to Zeisler Hudson Diamond motion to withdraw	0.50	1,625.00	812.50
07/10/2023	AEL2	Review underlying arguments and testimony for Zeisler Hudson Diamond withdrawal hearing	1.60	1,625.00	2,600.00
07/11/2023	DEB4	Correspond with P. Linsey (NPM) regarding Capital One production	0.30	1,320.00	396.00
07/11/2023	DEB4	Correspond with W. Farmer regarding M. Levine rule 2004 deposition	0.10	1,320.00	132.00
07/11/2023	DEB4	Correspond with A. Luft regarding Hudson Diamond transfers	0.40	1,320.00	528.00
07/11/2023	DEB4	Correspond with E. Sutton regarding M. Levine rule 2004 deposition	0.10	1,320.00	132.00
07/11/2023	ECS1	Analyze documents and related topics for M. Levine Rule 2004 deposition	1.30	1,015.00	1,319.50
07/11/2023	ECS1	Review and summarize documents produced in response to Rule 2004 requests	0.70	1,015.00	710.50
07/11/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 requests and meet and confers	0.30	1,015.00	304.50
07/11/2023	AEL2	Draft talking points re: Zeisler Hudson Diamond withdrawal motion for hearing	1.80	1,625.00	2,925.00
07/11/2023	AEL2	Analyze cases and arguments to prepare for Zeisler Hudson Diamond withdrawal oral argument	0.70	1,625.00	1,137.50

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07/11/2023	NAB	Correspond with W. Farmer regarding preparations for M. Levine Rule 2004 deposition and additional issues (.4); review case law on certain M. Levine deposition topics (.4)	0.80	1,625.00	1,300.00
07/11/2023	WCF	Analyze Philips Nizer and Elliot Kwok law firm documents regarding deposition of M. Levine (4.3); draft deposition outline regarding M. Levine and Elliot Kwok Rule 2004 deposition (2.9)	7.20	1,235.00	8,892.00
07/12/2023	DEB4	Follow up correspondence with J. Voss (FRA) regarding investigation	0.20	1,320.00	264.00
07/12/2023	DEB4	Conference with J. Voss (FRA) and A. Luft regarding forensic accounting investigation	0.60	1,320.00	792.00
07/12/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.30	1,015.00	304.50
07/12/2023	ECS1	Analyze additional topics and related documents for M. Levine Rule 2004 deposition	0.70	1,015.00	710.50
07/12/2023	AEI2	Prepare outline for forensic accountant interview (.3); interview J. Voss with D. Barron re: forensic accounting assignment (.6)	0.90	1,625.00	1,462.50
07/12/2023	AEI2	Review report from N. Bassett re: Lamp Capital counsel deposition	0.10	1,625.00	162.50
07/12/2023		Review and summarize informant's email on Himalaya and Kwok's associates	0.50	815.00	407.50
07/12/2023	NAB	Review and revise draft outline for M. Levine deposition (1.1); conference with W. Farmer regarding same (.2); attend deposition of M. Levine (2.5); follow-up conversation with W. Farmer regarding same (.3)	4.10	1,625.00	6,662.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	WCF	Supplement outlines for Rule 2004 deposition of M. Levine and Elliot Kwok Levine law firm (1.6); conference with N. Bassett regarding same (.2); take Rule 2004 deposition of M. Levine and Elliot Kwok Levine law firm (2.5); follow up conference with N. Bassett regarding same (.3)	4.60	1,235.00	5,681.00
07/13/2023	DEB4	Analyze documents related to Kwok investigation	0.80	1,320.00	1,056.00
07/13/2023	DEB4	Correspond with informant regarding informant email	0.20	1,320.00	264.00
07/13/2023		Review informant's email on HCHK and farm loan project	0.20	815.00	163.00
07/14/2023	DEB4	Correspond with L Despins regarding Himalaya Farms	0.20	1,320.00	264.00
07/14/2023	DEB4	Correspond with informant regarding tipster information	0.20	1,320.00	264.00
07/14/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.50	1,015.00	507.50
07/14/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.10	1,015.00	101.50
07/14/2023	ECS1	Prepare outline and cheat sheet in connection with Aaron Mitchell's testimony related to order to show cause why GTV and Saraca should not be held in contempt (2.0); correspond with A. Luft about same (.2)	2.20	1,015.00	2,233.00
07/14/2023	ECS1	Prepare documents and notes for 7/18/23 hearings and pretrial conference in Kwok case	0.80	1,015.00	812.00
07/14/2023		Review documents on Relativity in connection with Aaron Mitchell, GTV and Saraca	1.10	815.00	896.50
07/15/2023	AG30	Review F. Lawall and A. Mitchell production for documents reflecting significant transfers or specific discussions	2.80	915.00	2,562.00

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07/15/2023		Review and summarize informant's email on the farms, farm loan project, shell companies and Kwok's associates	1.20	815.00	978.00
07/15/2023		Review production from Francis Lawall on Relativity regarding Aaron Mitchell's connection with GTV and Saraca	2.50	815.00	2,037.50
07/16/2023	AG30	Review documents from rule 2004 productions in connection with contempt motion	2.00	915.00	1,830.00
07/16/2023	ECS1	Prepare parts of outline in connection with Aaron Mitchell's testimony for order to show cause why GTV and Saraca should not be held in contempt	2.00	1,015.00	2,030.00
07/16/2023		Correspond with L. Despins on informant's email about Himalaya Farms	0.10	815.00	81.50
07/17/2023	DEB4	Correspond with E. Sutton regarding Hudson Diamond contempt order	0.10	1,320.00	132.00
07/17/2023	DEB4	Conference with A. Luft regarding A. Mitchell cross examination (2.1); prepare parts of outline for same (2.4)	4.50	1,320.00	5,940.00
07/17/2023	DEB4	Correspond with L. Despins regarding Himalaya Farms	0.20	1,320.00	264.00
07/17/2023	DEB4	Correspond with E. Sutton regarding ROLF	0.10	1,320.00	132.00
07/17/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.40	1,015.00	406.00
07/17/2023	ECS1	Continue to prepare outline in connection with Aaron Mitchell's testimony related to order to show cause why GTV and Saraca should not be held in contempt (2.4); correspond with D. Barron about same (.5)	2.90	1,015.00	2,943.50
07/17/2023	ECS1	Review Rule of Law entities production of bank account information (.7); prepare summary of same for D. Barron (.2); correspond with P. Linsey (NPM) regarding same (.2)	1.10	1,015.00	1,116.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	ECS1	Review and summarize documents produced in response to rule 2004 motions	1.10	1,015.00	1,116.50
07/17/2023	AEL2	Meet with D. Barron re: questioning of Aaron Mitchell re: GTV and Saraca (2.1); prepare part of cross examination for same (.3); review legal arguments in briefs regarding same (.5)	2.90	1,625.00	4,712.50
07/17/2023		Review and summarize informant's email on farm activities and key Kwok associates	0.60	815.00	489.00
07/17/2023		Correspond with E. Sutton on exhibit list for the GTV, Saraca and Aaron Mitchell contempt hearing	0.10	815.00	81.50
07/17/2023	NAB	Correspond with A. Luft regarding preparations for 7/18/23 hearing and A. Mitchell examination	0.20	1,625.00	325.00
07/18/2023	DEB4	Correspond with A. Luft regarding A. Mitchell documents	0.10	1,320.00	132.00
07/18/2023	ECS1	Prepare exhibits for hearing on order to show cause why GTV and Saraca should not be held in contempt in connection with the motion to compel	0.20	1,015.00	203.00
07/18/2023	ECS1	Discussions with UnitedLex about Kwok discovery database	0.30	1,015.00	304.50
07/18/2023	ECS1	Call with D. Barron regarding 7/18/23 hearing, discovery in adversary proceedings, and forensic accountant retention	0.30	1,015.00	304.50
07/18/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.60	1,015.00	609.00
07/18/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.90	1,015.00	913.50
07/18/2023	AEL2	Review and supplement cross examination outline for A. Mitchell	3.80	1,625.00	6,175.00
07/18/2023	AEL2	Call with N. Bassett re: A. Mitchell cross examination	0.40	1,625.00	650.00
07/18/2023	AEL2	Call with N. Bassett re: HCHK and A. Mitchell hearing	0.50	1,625.00	812.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	NAB	Call with A. Luft regarding prep for hearing and cross examination of Aaron Mitchell in connection with discovery dispute (.4); call with A. Luft regarding HCHK and A. Mitchell hearing (.5); correspond with L. Despins regarding same (.1)	1.00	1,625.00	1,625.00
07/19/2023	DEB4	Correspond with N. Bassett regarding UAE issues	0.10	1,320.00	132.00
07/19/2023	DEB4	Correspond with P. Linsey (NPM) regarding EY discovery	0.10	1,320.00	132.00
07/19/2023	DEB4	Correspond with A. Bongartz regarding Kwok fee disclosure	0.10	1,320.00	132.00
07/19/2023	DEB4	Correspond with L. Despins regarding Kwok fee disclosures	0.10	1,320.00	132.00
07/19/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.50	1,015.00	507.50
07/19/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	1.30	1,015.00	1,319.50
07/19/2023	ECS1	Prepare document review protocol in connection with G Club document production (2.5); correspond with W. Farmer and about same (.3)	2.80	1,015.00	2,842.00
07/20/2023	ECS1	Prepare responses to rule 2004 targets in connection with outstanding rule 2004 requests and subpoenas (.1); call with P. Linsey (NPM) regarding same (.1)	0.20	1,015.00	203.00
07/20/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information (.1); call with P. Linsey (NPM) regarding same (.1)	0.20	1,015.00	203.00
07/20/2023	ECS1	Call with Ross Fingold (counsel to Nodal Partners) regarding service of rule 2004 subpoena (.1); email Ross Fingold regarding same (.1)	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	ECS1	Review and summarize documents produced in response to rule 2004 motion (1); call with P. Linsey (NPM) about same (1)	0.20	1,015.00	203.00
07/20/2023	ECS1	Prepare care package with and summarizing bank accounts and statements produced in Kwok discovery (.3); correspond with A. Ganapathi and J. Kuo about same (.3)	0.60	1,015.00	609.00
07/21/2023	ECS1	Review and summarize documents produced in response to rule 2004 request	0.10	1,015.00	101.50
07/21/2023	ECS1	Prepare responses to rule 2004 targets in connection with outstanding rule 2004 motions and subpoenas	0.10	1,015.00	101.50
07/21/2023	ECS1	Prepare care package with and summarizing bank accounts and statements produced in Kwok discovery (.1); correspond with UnitedLex regarding same (.3)	0.40	1,015.00	406.00
07/21/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.20	1,015.00	203.00
07/21/2023	WCF	Revise G-Club rule 2004 document review protocol	0.80	1,235.00	988.00
07/22/2023	AEL2	Edit sixth supplemental rule 2004 motion	1.10	1,625.00	1,787.50
07/23/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.10	1,015.00	101.50
07/24/2023	DM26	Prepare parts of bank statements spreadsheet for forensic accountant	1.30	540.00	702.00
07/24/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.20	1,015.00	203.00
07/24/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.30	1,015.00	304.50
07/24/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023	ECS1	Prepare care package with and summarizing bank accounts and statements produced in Kwok discovery (.2); correspond with A. Ganapathi and D. Mohamed about same (.1)	0.30	1,015.00	304.50
07/24/2023	AEL2	Correspond with D. Barron and E. Sutton re: sixth supplemental rule 2004 motion edits	0.10	1,625.00	162.50
07/24/2023		Review information regarding certain informants	0.20	815.00	163.00
07/24/2023		Review informant's emails on Kwok related entities and persons	1.50	815.00	1,222.50
07/25/2023	DM26	Prepare parts of bank statements spreadsheet for forensic accountant	1.40	540.00	756.00
07/25/2023	DEB4	Correspond with regarding witness email	0.20	1,320.00	264.00
07/25/2023	ECS1	Correspond with A. Ganapathi, , D. Mohamed and UnitedLex regarding bank accounts and statements produced in Kwok discovery	0.20	1,015.00	203.00
07/25/2023	ECS1	Review and summarize documents produced in response to rule 2004 motion	0.10	1,015.00	101.50
07/25/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.20	1,015.00	203.00
07/25/2023		Prepare spreadsheet summary of bank statements on Relativity for forensic accounting analysis	4.00	815.00	3,260.00
07/26/2023	AG30	Prepare summary of bank account information for forensic analyst	3.50	915.00	3,202.50
07/26/2023	DEB4	Correspond with E. Sutton regarding next rule 2004 motion	0.30	1,320.00	396.00
07/26/2023	DEB4	Correspond with regarding update email to L. Despins on informant intelligence	0.20	1,320.00	264.00
07/26/2023	DEB4	Correspond with L. Despins regarding informant email	0.20	1,320.00	264.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	DEB4	Analyze contempt decision	0.80	1,320.00	1,056.00
07/26/2023	DEB4	Correspond with S. Maza regarding turnover issues	0.20	1,320.00	264.00
07/26/2023	ECS1	Correspond with A. Ganapathi, , D. Mohamed and UnitedLex regarding bank accounts and statements produced in Kwok discovery	0.10	1,015.00	101.50
07/26/2023	ECS1	Prepare sixth supplemental rule 2004 motion (1.2); correspond with D. Barron regarding same (.2)	1.40	1,015.00	1,421.00
07/26/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.20	1,015.00	203.00
07/26/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests	0.30	1,015.00	304.50
07/26/2023	JK21	Prepare parts of forensic accountant bank spreadsheet	3.10	540.00	1,674.00
07/26/2023	LAD4	Read contempt ruling (.50); analyze/comment on RICO issues (2.90)	3.40	1,860.00	6,324.00
07/26/2023		Prepare parts of spreadsheet regarding bank statements for forensic analysis	3.00	815.00	2,445.00
07/26/2023	NAB	Review debtor discovery contempt decision (.4); call with L. Despins regarding same (.2)	0.60	1,625.00	975.00
07/27/2023	DEB4	Correspond with regarding informant email	0.20	1,320.00	264.00
07/27/2023	ECS1	Prepare sixth supplemental rule 2004 motion (1.1); correspond with D. Barron regarding same (.2)	1.30	1,015.00	1,319.50
07/27/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.10	1,015.00	101.50
07/27/2023	ECS1	Correspond with A. Ganapathi, , D. Mohamed and UnitedLex regarding bank accounts and statements produced in Kwok discovery	0.20	1,015.00	203.00
07/27/2023	JK21	Prepare parts of forensic accountant bank spreadsheet	2.00	540.00	1,080.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/27/2023		Review information on Yaqin Li, witness who testified for Kwok at preliminary injunction hearing	0.30	815.00	244.50
07/27/2023		Review G Club production for information about Yumei Hao for the sixth supplemental Rule 2004 motion	1.30	815.00	1,059.50
07/27/2023	NAB	Review information related to witness who testified at protests preliminary injunction hearing and potential relevant case developments related to same (.3); correspond with L. Despins regarding same (.1)	0.40	1,625.00	650.00
07/28/2023	DEB4	Correspond with N. Bassett regarding Kwok follower witness	0.20	1,320.00	264.00
07/28/2023	ECS1	Review document production and summarize bank accounts and statements produced in Kwok discovery for forensic accountant (3.4); correspond with D. Mohamed about same (.1)	3.50	1,015.00	3,552.50
07/28/2023	ECS1	Review and summarize documents produced in response to Rule 2004 requests	0.30	1,015.00	304.50
07/28/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.10	1,015.00	101.50
07/28/2023	ECS1	Prepare summary of certain financial transactions of the Debtor and his affiliates in connection with meet and confers with rule 2004 discovery targets (.8); call with P. Linsey (NPM) regarding same (.2)	1.00	1,015.00	1,015.00
07/28/2023		Prepare summary of informant email on GTV, HCHK	0.70	815.00	570.50
07/28/2023		Review information on Yaqin Li, witness who testified in preliminary injunction hearing	0.50	815.00	407.50
07/28/2023	NAB	Review order to show cause regarding Hudson Diamond discovery (.2); correspond with L. Despins regarding same (.1)	0.30	1,625.00	487.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
 50687-00002
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/2023	DM26	Prepare parts of bank statements spreadsheet for forensic accountant	2.50	540.00	1,350.00
07/30/2023	DEB4	Correspond with informant regarding informant emails (0.1); correspond with N. Bassett regarding potential disqualification of Yvette Wang's criminal counsel (0.1); review L. Despins emails regarding informant information (0.2)	0.40	1,320.00	528.00
07/30/2023	DEB4	Correspond with informant regarding informant emails (1.0); correspond with L. Despins and N. Bassett regarding formerfedsgroup.com (0.1)	1.10	1,320.00	1,452.00
07/31/2023	DEB4	Review email from witness in UK regarding	0.10	1,320.00	132.00
07/31/2023	DEB4	Correspond with L. Despins regarding Kroll care package	0.10	1,320.00	132.00
07/31/2023	DEB4	Conference with E. Sutton regarding documents and spreadsheet for forensic accountant	0.20	1,320.00	264.00
07/31/2023	DEB4	Correspond with L. Despins regarding additional rule 2004 targets	0.20	1,320.00	264.00
07/31/2023	ECS1	Prepare response to Rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.10	1,015.00	101.50
07/31/2023	ECS1	Prepare chart and summary of bank accounts and statements produced in Kwok discovery for forensic accountant (3.3); call with D. Barron regarding same (.2); correspond with D. Barron regarding same (.2)	3.70	1,015.00	3,755.50
07/31/2023	JK21	Prepare parts of bank statements spreadsheet for forensic accountant	4.40	540.00	2,376.00
07/31/2023		Review Nicole Tsai's July 29 livestream on Kwok and Yvette Wang and their new legal team	1.40	815.00	1,141.00
Subtotal: B261 Investigations			162.20		182,711.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B262 Contempt Proceedings					
07/24/2023	NAB	Analyze arguments for Mei Guo discovery sanctions appeal (.4); call with P. Linsey (NPM), W. Farmer regarding same (.4)	0.80	1,625.00	1,300.00
07/24/2023	WCF	Call with P. Linsey (NPM), D. Carnelli and N. Bassett regarding sanctions and contempt order appeal (.4); prepare notes regarding next steps (.1)	0.50	1,235.00	617.50
Subtotal: B262 Contempt Proceedings			1.30		1,917.50
Total			193.90		219,121.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	3.90	1,860.00	7,254.00
NAB	Nicholas A. Bassett	Partner	15.20	1,625.00	24,700.00
NAB	Nicholas A. Bassett	Partner	2.90	812.50	2,356.25
AEL2	Luft, Avi E.	Of Counsel	27.10	1,625.00	44,037.50
AEL2	Luft, Avi E.	Of Counsel	2.30	812.50	1,868.75
AB21	Alex Bongartz	Of Counsel	2.50	1,625.00	4,062.50
DEB4	Douglass E. Barron	Associate	16.80	1,320.00	22,176.00
WCF	Will C. Farmer	Associate	15.80	1,235.00	19,513.00
ECS1	Ezra C. Sutton	Associate	53.80	1,015.00	54,607.00
AG30	Anuva V. Ganapathi	Associate	8.30	915.00	7,594.50
		Associate	23.60	815.00	19,234.00
JK21	Jocelyn Kuo	Paralegal	11.60	540.00	6,264.00
DM26	David Mohamed	Paralegal	10.10	540.00	5,454.00

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
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Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	Photocopy Charges	552.00	0.08	44.16
07/18/2023	Photocopy Charges	714.00	0.08	57.12
07/01/2023	Electronic Document Retrieval - TransUnion Risk and Alternative Data Solutions, Inc., Invoice# 1047352-202306-1 Dated 07/01/23, TLO Charges for June 01, 2023 - June 30, 2023 - TruLookup US Business Search Advanced/Person Search/Comprehensive Report/.			220.00
07/01/2023	Westlaw			47.56
07/02/2023	Lexis/On Line Search			53.90
07/02/2023	Westlaw			190.23
07/03/2023	Lexis/On Line Search			15.04
07/03/2023	Lexis/On Line Search			468.65
07/03/2023	Westlaw			71.34
07/03/2023	Computer Search (Other)			1.08
07/04/2023	Computer Search (Other)			1.08
07/05/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163273; 07/05/2023; ; NA; 1 WORLD TRADE CTR; NEW YORK, NY 10007 ; 1ZA6T1631299407428 (MAN)			16.67
07/05/2023	Lexis/On Line Search			56.16
07/05/2023	Westlaw			47.56
07/05/2023	Westlaw			71.34
07/05/2023	Computer Search (Other)			1.08
07/06/2023	Airfare - Nick Bassett; 06/26/2023; From/To: DCA/LGA; Airfare Class: Economy; Travel to NY/CT to meet with client			213.90
07/06/2023	Travel Expense - Meals - Nick Bassett; 06/26/2023; Restaurant: Big Bowl; City: Arlington, VA; Lunch; Number of people: 1; Travel to NY/CT to meet with client			23.38

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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07/06/2023	Travel Expense - Meals - Nick Bassett; 06/27/2023; Restaurant: Spotted Horse Tavern; City: Shelton, CT; Dinner; Number of people: 1; Travel to NY/CT to meet with client	40.00
07/06/2023	Lodging - Nick Bassett; 06/28/2023; Hotel: Marriott; City: Shelton, CT; Check-in date: 06/26/2023; Check-out date: 06/28/2023; Travel to NY/CT to meet with client	469.72
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/27/2023; From/To: meeting/hotel; Service Type: Uber; Time: 17:12; Travel to NY/CT to meet with client	12.91
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/27/2023; From/To: hotel/dinner; Service Type: Uber; Time: 18:26; Travel to NY/CT to meet with client	13.91
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/27/2023; From/To: hotel/meeting; Service Type: Uber; Time: 09:38; Travel to NY/CT to meet with client	14.92
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/27/2023; From/To: dinner/hotel; Service Type: Uber; Time: 21:03; Travel to NY/CT to meet with client	14.97
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; From/To: hotel/meeting; Service Type: Uber; Time: 08:11; Travel to NY/CT to meet with client	15.93
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/26/2023; From/To: home/airport; Service Type: Uber; Time: 18:41; Travel to NY/CT to meet with client	16.93
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/26/2023; From/To: airport/hotel; Service Type: Uber; Time: 21:15; Travel to NY/CT to meet with client	201.15

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; From/To: office/meeting; Service Type: Uber; Time: 12:47; Travel to NY/CT to meet with client	21.92
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; Travel to NY/CT to meet with client- MTA ticket; Service Charge	25.00
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; Travel to NY/CT to meet with client- MTA ticket	26.00
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; Rail: Amtrak; Travel to NY/CT to meet with client-NYP to WAS	337.00
07/06/2023	Taxi/Ground Transportation - Nick Bassett; 06/28/2023; From/To: train station/home; Service Type: Uber; Time: 16:03; Travel to NY/CT to meet with client	48.95
07/06/2023	Local - Meals - Nick Bassett; 06/28/2023; Restaurant: Birch Coffee; City: New York; Coffee; Number of people: 1; Travel to NY/CT to meet with client	4.81
07/06/2023	Vendor Expense - Nick Bassett; 06/26/2023; Travel to NY/CT to meet with client; Baggage Fee	35.00
07/06/2023	Lexis/On Line Search	421.28
07/06/2023	Lexis/On Line Search	56.17
07/06/2023	Westlaw	102.30
07/06/2023	Westlaw	118.89
07/06/2023	Computer Search (Other)	1.08
07/06/2023	Computer Search (Other)	7.02
07/07/2023	Computer Search (Other)	1.08
07/09/2023	Westlaw	71.34
07/10/2023	Westlaw	118.89
07/10/2023	Computer Search (Other)	1.08
07/11/2023	Lexis/On Line Search	84.26
07/11/2023	Westlaw	23.78

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
Kwok
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07/11/2023	Computer Search (Other)	0.18
07/11/2023	Computer Search (Other)	2.61
07/12/2023	Computer Search (Other)	2.70
07/13/2023	Computer Search (Other)	2.61
07/14/2023	Computer Search (Other)	0.90
07/17/2023	Computer Search (Other)	0.72
07/18/2023	Westlaw	23.78
07/18/2023	Computer Search (Other)	0.90
07/19/2023	Airfare - Nick Bassett; 07/10/2023; From/To: DCA/LGA; Airfare Class: Economy; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	601.41
07/19/2023	Travel Expense - Meals - Nick Bassett; 07/11/2023; Restaurant: Mystik Masala; City: New York; Dinner; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	12.37
07/19/2023	Travel Expense - Meals - Nick Bassett; 07/11/2023; Restaurant: Lebanese Taverna Express; City: New York; Lunch; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	6.57
07/19/2023	Travel Expense - Meals - Nick Bassett; 07/12/2023; Restaurant: LGA Hunt and Fish Club; City: New York; Lunch; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	8.95
07/19/2023	Lodging - Nick Bassett; 07/12/2023; Hotel: Hyatt; City: New York; Check-in date: 07/11/2023; Check- out date: 07/12/2023; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	230.67

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/11/2023; From/To: home/DCA; Service Type: Uber; Time: 06:45; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	10.00
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/12/2023; From/To: DCA/Home; Service Type: Uber; Time: 19:24; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	10.45
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/11/2023; From/To: LGA/Meeting in CT; Service Type: Uber; Time: 09:25; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	108.33
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/12/2023; From/To: PH/LGA; Service Type: Uber; Time: 14:15; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	38.49
07/19/2023	Travel Expense - Internet - Nick Bassett; 07/11/2023; Travel to NY/CT to meet with client; Inflight Wi-Fi (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	7.50
07/19/2023	Travel Expense - Internet - Nick Bassett; 07/11/2023; Travel to NY/CT to meet with client; Inflight Wi-Fi (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	7.50
07/19/2023	Westlaw	269.31
07/19/2023	Computer Search (Other)	0.90
07/20/2023	Computer Search (Other)	0.81
07/21/2023	Computer Search (Other)	0.99
07/25/2023	Westlaw	95.12

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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07/26/2023	Local - Taxi - Douglass Barron; 07/18/2023; From/To: Office/Home ; Service Type: Lyft; Time: 02:37; working late on Kwok matter	33.74
07/26/2023	Attorney Service - Serving By Irving Inc., Invoice# YL-4015A Dated 07/26/23, two services of First Set of Requests on Anthony DiBattista and Brian Hofmeister and the attempted service and service of a subpoena on Linwan "Irene" Feng	575.00
07/26/2023	Westlaw	142.66
07/28/2023	Local - Meals - Douglass Barron; 07/18/2023; Restaurant: Han Dynasty; City: New York ; Dinner; Number of people: 1; Working late on Kwok matter	34.29
07/28/2023	Local - Parking - Luc Despins; 06/27/2023; Parking at courthouse for KWOK hearing	13.00
07/28/2023	Local - Parking - Luc Despins; 05/30/2023; Parking at courthouse for KWOK hearing	6.00
07/31/2023	Airfare - Will Farmer; 07/10/2023; From/To: LAX/JFK/JFK/LAX; Airfare Class: Economy; Travel to and from NYC for a deposition; Delta Airlines	775.80
07/31/2023	Lodging - Will Farmer; 07/13/2023; Hotel: Hampton Inn; City: New York; Check-in date: 07/11/2023; Check-out date: 07/13/2023; Travel to and from NYC for a deposition	819.44
07/31/2023	Taxi/Ground Transportation - Will Farmer; 07/14/2023; From/To: hotel/airport; Service Type: Taxi; Time: 14:00; Travel to and from NYC for a deposition; First City Cab Corp	102.66
07/31/2023	Taxi/Ground Transportation - Will Farmer; 07/11/2023; From/To: airport/hotel; Service Type: Taxi; Time: 14:00; Travel to and from NYC for a deposition; NYC Taxi	98.41
07/31/2023	Travel Expense - Parking - Will Farmer; 07/15/2023; Travel to and from NYC for a deposition; LAX Smartparking - Parking at LAX for Tuesday - Thursday 7/11/23 - 7/13/23	104.99

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
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07/31/2023	Travel Expense - Parking - Will Farmer; 07/15/2023; Travel to and from NYC for a deposition; Economy LAX Smart Parking - extension parking fee at LAX	68.00
07/31/2023	UnitedLex Invoices - Unitedlex Corp, Invoice# 088560 Dated 07/31/23, UnitedLex – DSAI July 2023 Charges – Outside Professional Services	93,448.02
07/31/2023	Vendor Expense - Will Farmer; 07/14/2023; Travel to and from NYC for a deposition; Delta Airlines - Additional Delta flight change fee; Service Charge	10.00
07/31/2023	Vendor Expense - Will Farmer; 07/13/2023; Travel to and from NYC for a deposition; Delta Airlines – Flight change Fee; Service Charge	48.00
Total Costs incurred and advanced		\$101,630.32
Current Fees and Costs		\$320,751.82
Total Balance Due - Due Upon Receipt		\$320,751.82



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369634

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Other Litigation

PH LLP Client/Matter # 50687-00003
Nicholas A. Bassett

Legal fees for professional services for the period ending July 31, 2023	\$2,431.00
Costs incurred and advanced	955.62
Current Fees and Costs Due	\$3,386.62
Total Balance Due - Due Upon Receipt	\$3,386.62

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
2050 M Street NW, Washington, DC 20036
t: +1.202.551.1700 | f: +1.202.551.1705 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369634

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Other Litigation

PH LLP Client/Matter # 50687-00003
Nicholas A. Bassett

Legal fees for professional services for the period ending July 31, 2023	\$2,431.00
Costs incurred and advanced	955.62
Current Fees and Costs Due	\$3,386.62
Total Balance Due - Due Upon Receipt	\$3,386.62

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
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 t: +1.202.551.1700 | f: +1.202.551.1705 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369634

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Other Litigation **\$2,431.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/03/2023	JK21	Correspond with L. Despins regarding Kwok criminal proceedings	0.30	540.00	162.00
07/05/2023	JK21	Correspond with L. Despins regarding Kwok criminal proceedings	0.20	540.00	108.00
07/06/2023	JK21	Correspond with L. Despins regarding Kwok criminal proceedings	0.20	540.00	108.00
07/11/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins	0.20	540.00	108.00
07/12/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins (0.2); correspond with L. Despins regarding Kwok criminal case (0.2)	0.40	540.00	216.00
07/13/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins (0.2); correspond with L. Despins regarding Kwok criminal case (0.2)	0.40	540.00	216.00
07/15/2023	NAB	Review decision from criminal court on Wang bail	0.20	1,625.00	325.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00003
Invoice No. 2369634

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	JK21	Review recent filings in Kwok criminal case and appeals (0.2); correspond with L. Despins regarding Kwok criminal case (0.2)	0.40	540.00	216.00
07/18/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/19/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/20/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/21/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/24/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/25/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/26/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/28/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
07/31/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
Subtotal: B191 General Litigation			4.10		2,431.00

Total		4.10	2,431.00
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	0.20	1,625.00	325.00
JK21	Jocelyn Kuo	Paralegal	3.90	540.00	2,106.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00003
Invoice No. 2369634

Page 3

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/03/2023	Westlaw			25.17
07/05/2023	Westlaw			25.16
07/06/2023	Westlaw			615.61
07/06/2023	Computer Search (Other)			7.20
07/07/2023	Lexis/On Line Search			26.95
07/07/2023	Westlaw			136.93
07/13/2023	Westlaw			118.60
Total Costs incurred and advanced				\$955.62

Current Fees and Costs	\$3,386.62
Total Balance Due - Due Upon Receipt	\$3,386.62



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369635

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Corporate Law Issues

PH LLP Client/Matter # 50687-00004
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$12,843.50

Current Fees and Costs Due

\$12,843.50

Total Balance Due - Due Upon Receipt

\$12,843.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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September 7, 2023

Please Refer to
Invoice Number: 2369635

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Corporate Law Issues

PH LLP Client/Matter # 50687-00004
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$12,843.50

Current Fees and Costs Due

\$12,843.50

Total Balance Due - Due Upon Receipt

\$12,843.50

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September 7, 2023

Please Refer to
 Invoice Number: 2369635

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Corporate Law Issues **\$12,843.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B190 Other Contested Matters(excl. assumption/rejections motions)					
07/06/2023	NAB	Email with E. Henzy (Zeisler) and P. Linsey (NPM) regarding Ace Decade contempt appeal issues	0.20	1,625.00	325.00
07/09/2023	NAB	Email with P. Linsey (NPM) regarding Ace Decade contempt appeal	0.10	1,625.00	162.50
07/20/2023	NAB	Correspond with E. Henzy (Zeisler) regarding Ace Decade contempt appeal	0.20	1,625.00	325.00
07/25/2023	AB21	Revise status report for appeal of corporate governance order (0.4); correspond with L. Despins regarding same (0.1); correspond with J. Moriarty (Zeisler) regarding same (0.1); call with J. Moriarty regarding same (0.1)	0.70	1,625.00	1,137.50
07/25/2023	LAD4	Numerous emails with J. Moriarty (Z&Z) re: appeal status report re: letter ruling	1.20	1,860.00	2,232.00
07/26/2023	AB21	Correspond with L. Despins and N. Bassett regarding joint status report for corporate governance order appeal (0.2); call with N. Bassett regarding same (0.1); analyze same (0.1)	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00004
Invoice No. 2369635

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	LAD4	Mark-up final draft appeal report	0.30	1,860.00	558.00
07/26/2023	NAB	Correspond with L. Despins and A. Bongartz regarding Ace Decade appeal issues and strategy (.1); call with A. Bongartz regarding same (.1)	0.20	1,625.00	325.00
07/27/2023	AB21	Call with L. Despins and N. Bassett regarding status report for appeal of corporate governance order (0.3); correspond with J. Moriarty (Zeisler) regarding same (0.1)	0.40	1,625.00	650.00
07/27/2023	LAD4	T/c A. Bongartz & N. Bassett re: delay in Ace Decade contempt appeal	0.30	1,860.00	558.00
07/27/2023	NAB	Call with L. Despins and A. Bongartz regarding Ace Decade appeal update and strategy (.3); analyze issues related to same (.2)	0.50	1,625.00	812.50
07/28/2023	AB21	Finalize joint status report for appeal of corporate governance order (0.1); correspond with N. Bassett regarding same (0.1); correspond with J. Moriarty (Zeisler) regarding same (0.1)	0.30	1,625.00	487.50
Subtotal: B190 Other Contested Matters(excl. assumption/rejections motions)			4.80		8,223.00

B191 General Litigation

07/17/2023	AB21	Call with A. Thorp (Harneys Legal) regarding Ace Decade strategy	0.10	1,625.00	162.50
07/18/2023	AB21	Correspond with A. Thorp (Harneys Legal) regarding BVI strategy related to Ace Decade	0.60	1,625.00	975.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00004
Invoice No. 2369635

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	AB21	Call with A. Thorp (Harneys Legal) regarding BVI strategy with respect to Ace Decade (0.4); analyze same (0.3); correspond with A. Thorp regarding same (0.1); correspond with N. Bassett, A. Luft and L. Despins regarding same (0.2); call with A. Luft and L. Despins regarding same (0.2); further call with L. Despins regarding same (0.1); correspond with L. Despins regarding same (0.3)	1.60	1,625.00	2,600.00
07/19/2023	LAD4	T/c A. Bongartz, A. Luft re: Ace Decade next steps (.20); t/c A. Bongartz re: BVI proceeding (.10)	0.30	1,860.00	558.00
07/19/2023	AEL2	Call with A. Bongartz and L. Despins re: BVI legal question re: Ace Decade	0.20	1,625.00	325.00
Subtotal: B191 General Litigation			2.80		4,620.50
Total			7.60		12,843.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	2.10	1,860.00	3,906.00
NAB	Nicholas A. Bassett	Partner	1.20	1,625.00	1,950.00
AB21	Alex Bongartz	Of Counsel	4.10	1,625.00	6,662.50
AEL2	Luft, Avi E.	Of Counsel	0.20	1,625.00	325.00

Current Fees and Costs	\$12,843.50
Total Balance Due - Due Upon Receipt	\$12,843.50



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369636

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Sales Process

PH LLP Client/Matter # 50687-00005
Nicholas A. Bassett

Legal fees for professional services for the period ending July 31, 2023	\$7,875.50
Costs incurred and advanced	3,831.75
Current Fees and Costs Due	\$11,707.25
Total Balance Due - Due Upon Receipt	\$11,707.25

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200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369636

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Sales Process

PH LLP Client/Matter # 50687-00005
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$7,875.50

Costs incurred and advanced

3,831.75

Current Fees and Costs Due

\$11,707.25

Total Balance Due - Due Upon Receipt

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September 7, 2023

Please Refer to
 Invoice Number: 2369636

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Sales Process **\$7,875.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B130 Asset Disposition					
07/05/2023	AB21	Correspond with D. Johnson (Edmiston) regarding update on Lady May 2	0.10	1,625.00	162.50
07/05/2023	DEB4	Correspond with L. Despins regarding objections to Lady May sale	0.10	1,320.00	132.00
07/05/2023	ECS1	Prepare closing statement and notice thereof in connection with sale of the Lady May	0.50	1,015.00	507.50
07/06/2023	AB21	Correspond with R. Stockil (Yachtzoo) regarding post-closing administrative matters regarding Lady May (0.1); revise notice of closing statement (0.2); call and correspond with E. Sutton regarding same (0.1)	0.40	1,625.00	650.00
07/06/2023	ECS1	Prepare closing statement and notice thereof in connection with sale of the Lady May (.5); call and correspond with A. Bongartz about same (.1)	0.60	1,015.00	609.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00005
Invoice No. 2369636

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	AB21	Finalize closing statement for Lady May sale (0.1); correspond with L. Despins regarding same (0.1); correspond with D. Skalka (Neubert) regarding same (0.1); correspond with E. Sutton and J. Kuo regarding filing and service of same (0.1)	0.40	1,625.00	650.00
07/07/2023	ECS1	Prepare closing statement in connection with the sale of the Lady May	0.70	1,015.00	710.50
07/07/2023	JK21	Prepare closing statement regarding Lady May sale (0.2); electronically file with the court closing statement regarding Lady May sale (0.3)	0.50	540.00	270.00
07/10/2023	AB21	Call with L. Macdonald (Alley Maass) regarding crew salary payment (0.3); correspond with R. Stockil (Yachtzoo) and J. Avedis (Yachtzoo) regarding same (0.2); call with D. Johnson (Edmiston) regarding Lady May 2 sale process (0.2)	0.70	1,625.00	1,137.50
07/11/2023	AB21	Review correspondence from J. Avedis (Yachtzoo) regarding crew salary wire transfer	0.10	1,625.00	162.50
07/13/2023	AB21	Correspond with R. Stockil (Yachtzoo) regarding crew releases	0.10	1,625.00	162.50
07/14/2023	AB21	Correspond with D. Johnson (Edmiston) regarding delivery of storage pod	0.10	1,625.00	162.50
07/17/2023	AB21	Correspond with D. Johnson (Edmiston) regarding storage pod (0.2); call with D. Johnson regarding same (0.2); call with L. Macdonald (Alley Maass) regarding crew releases (0.1); correspond with L. Macdonald regarding same (0.1)	0.60	1,625.00	975.00
07/19/2023	AB21	Call with D. Johnson (Edmiston) regarding update on Lady May 2 sale process (0.1); review customs bond application (0.2); correspond with L. Macdonald (Alley Maass) regarding crew releases with respect to Lady May sale (0.1)	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00005
Invoice No. 2369636

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	AB21	Call with E. Sutton regarding motion to authorize auctioning of Sherry Netherland furniture	0.10	1,625.00	162.50
07/20/2023	ECS1	Call with A. Bongartz regarding motion to auction estate assets (.1); call with P. Linsey (NPM) regarding same (.1)	0.20	1,015.00	203.00
07/21/2023	ECS1	Review correspondence from P. Linsey (NPM) regarding motion to auction estate assets	0.10	1,015.00	101.50
07/23/2023	ECS1	Review correspondence from P. Linsey (NPM) regarding motion to auction estate assets	0.10	1,015.00	101.50
07/24/2023	AB21	Correspond with D. Johnson (Edmiston) regarding update on contents of storage pod	0.10	1,625.00	162.50
07/24/2023	ECS1	Correspond with A. Bongartz and P. Linsey (NPM) regarding motion to auction estate assets	0.20	1,015.00	203.00
Subtotal: B130 Asset Disposition			6.10		7,875.50
Total			6.10		7,875.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
AB21	Alex Bongartz	Of Counsel	3.10	1,625.00	5,037.50
DEB4	Douglass E. Barron	Associate	0.10	1,320.00	132.00
ECS1	Ezra C. Sutton	Associate	2.40	1,015.00	2,436.00
JK21	Jocelyn Kuo	Paralegal	0.50	540.00	270.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00005
Invoice No. 2369636

Page 4

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/03/2023	Outside Professional Services - Bohannon Law Firm, LLC, Invoice# 1 Dated 07/03/23, Professional services rendered - June 2023			3,831.75
Total Costs incurred and advanced				\$3,831.75
Current Fees and Costs				\$11,707.25
Total Balance Due - Due Upon Receipt				\$11,707.25



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200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369637

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Genever US

PH LLP Client/Matter # 50687-00010
Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$33,189.75

Current Fees and Costs Due

\$33,189.75

Total Balance Due - Due Upon Receipt

\$33,189.75

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REMITTANCE COPY

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Nicholas A. Bassett

Legal fees for professional services
for the period ending July 31, 2023

\$33,189.75

Current Fees and Costs Due

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Total Balance Due - Due Upon Receipt

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Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending July 31, 2023

Genever US

\$33,189.75

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 Case Administration					
07/05/2023	AB21	Correspond with L. Despins regarding proxy from C. Abrehart (Harneys Corporate) with respect to Genever US	0.10	1,625.00	162.50
07/20/2023	AB21	Correspond with C. Abrehart (Genever BVI director) and L. Despins regarding update call	0.10	1,625.00	162.50
07/21/2023	AB21	Call with G. Weston (Harneys Legal) regarding power of attorney with respect to Genever	0.20	1,625.00	325.00
07/21/2023	AB21	Correspond with C. Abrehart (Genever BVI director) regarding case update call	0.10	1,625.00	162.50
07/23/2023	AB21	Correspond with L. Despins regarding update call with C. Abrehart (director)	0.40	1,625.00	650.00
07/24/2023	AB21	Call with C. Abrehart (Genever BVI director) regarding Genever case update and DIP financing	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00010
Invoice No. 2369637

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	AB21	Correspond with C. Abrehart (Genever BVI director) regarding POA for DIP financing	0.10	1,625.00	162.50
Subtotal: B110 Case Administration			1.40		2,275.00
 B131 Sale of Real Estate					
07/19/2023	LAD4	Review/comment on sale process Sherry Netherland	3.10	1,860.00	5,766.00
Subtotal: B131 Sale of Real Estate			3.10		5,766.00
 B165 Fee/Employment Applications for Other Professionals					
07/07/2023	AB21	Correspond with L. Despins regarding questions from U.S. Trustee regarding AAGL retention application (0.2); correspond with J. Panico (AAGL) regarding same (0.1)	0.30	1,625.00	487.50
07/08/2023	AB21	Correspond with L. Despins regarding AAGL retention application (0.2); correspond with H. Claiborn (U.S. Trustee) regarding same (0.1)	0.30	1,625.00	487.50
07/10/2023	AB21	Revise proposed order for AAGL retention (0.3); correspond with H. Claiborn (U.S. Trustee) regarding same (0.1); correspond with J. Kuo regarding notice of filing of same (0.1)	0.50	1,625.00	812.50
07/20/2023	AB21	Research regarding potential insurance counsel (1.8); correspond with L. Despins regarding same (0.1)	1.90	1,625.00	3,087.50
07/21/2023	AB21	Research regarding potential insurance counsel (1.2); correspond with L. Despins regarding same (1.1)	2.30	1,625.00	3,737.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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Invoice No. 2369637

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023	AB21	Call with P. Linsey regarding retention of architect (0.1); correspond with L. Despins regarding same (0.2); correspond with H. Claiborn (U.S. Trustee) regarding same (0.2)	0.50	1,625.00	812.50
07/25/2023	AB21	Correspond with P. Linsey (Neubert) regarding retention of architect	0.10	1,625.00	162.50
07/27/2023	AB21	Correspond with D. Acheson (architect) regarding retention application (0.2); correspond with L. Despins regarding McCormick retention application (0.2)	0.40	1,625.00	650.00
07/31/2023	AB21	Correspond L. Despins regarding OMJB retention application (0.2); revise same (0.2); correspond with M. McCormack (OMJB) regarding same (0.1); correspond with D. Acheson (architect) regarding retention application (0.1); call with P. Linsey (Neubert) regarding same (0.2)	0.80	1,625.00	1,300.00
Subtotal: B165 Fee/Employment Applications for Other Professionals			7.10		11,537.50

B195 Non-Working Travel

07/20/2023	AB21	Non-working travel to/from NY office to Sherry Netherland apartment (Bill at 1/2 rate)	0.70	812.50	568.75
07/27/2023	AB21	Travel from PH office to SN apartment for site visit with architect (Bill at 1/2 rate)	0.60	812.50	487.50
Subtotal: B195 Non-Working Travel			1.30		1,056.25

B210 Business Operations

07/12/2023	DEB4	Correspond with L. Despins regarding discussion with Wolfson agency	0.20	1,320.00	264.00
07/14/2023	DEB4	Conference with T. Sadler regarding Genever insurance	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	DEB4	Correspond with L. Despins regarding Genever insurance	0.20	1,320.00	264.00
07/14/2023	TS21	Call with D. Barron re AIG insurance payment (.1); correspond with D. Barron and L. Despins re same (.1); review and comment on AIG insurance payments (.3)	0.50	1,175.00	587.50
07/20/2023	AB21	Correspond with K. Catalano regarding motion authorizing remediation of Sherry Netherland apartment	0.20	1,625.00	325.00
07/20/2023	AB21	Meeting with L. Despins, M. Ullman (Sherry Netherland), J. Panico (AAGL) regarding Sherry Netherland apartment remediation	1.00	1,625.00	1,625.00
07/20/2023	LAD4	Visit SN apartment with A. Bongartz and J. Panico (public adjuster)	1.00	1,860.00	1,860.00
07/25/2023	AB21	Call with D. Acheson (architect) regarding remediation of Sherry Netherland apartment (0.4); correspond with D. Acheson regarding same (0.1); correspond with L. Despins regarding same (0.1)	0.60	1,625.00	975.00
07/25/2023	LAD4	T/c J. Panico (adjuster) re: repairs report/next steps (.90); review/comment on same (architect/contractor) (1.40)	2.30	1,860.00	4,278.00
07/26/2023	AB21	Correspond with D. Acheson (architect) regarding Sherry Netherland site visit (0.1); correspond with L. Despins regarding same (0.1)	0.20	1,625.00	325.00
07/27/2023	AB21	Site visit of SN apartment with D. Acheson (architect) (0.8); correspond with L. Despins regarding same (0.3)	1.10	1,625.00	1,787.50
Subtotal: B210 Business Operations			7.40		12,423.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B211 Financial Reports (Monthly Operating Reports)					
07/03/2023	DEB4	Correspond with D. Skalka (NPM) and J. Gervais (UST) regarding MOR	0.10	1,320.00	132.00
Subtotal: B211 Financial Reports (Monthly Operating Reports)			0.10		132.00
Total			20.40		33,189.75

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	6.40	1,860.00	11,904.00
AB21	Alex Bongartz	Of Counsel	11.60	1,625.00	18,850.00
AB21	Alex Bongartz	Of Counsel	1.30	812.50	1,056.25
DEB4	Douglass E. Barron	Associate	0.60	1,320.00	792.00
TS21	Tess Sadler	Associate	0.50	1,175.00	587.50

Current Fees and Costs	\$33,189.75
Total Balance Due - Due Upon Receipt	\$33,189.75



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369638

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Mahwah Adversary Proceeding

PH LLP Client/Matter # 50687-00012
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$98,916.00
Costs incurred and advanced	350.90
Current Fees and Costs Due	\$99,266.90
Total Balance Due - Due Upon Receipt	\$99,266.90

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369638

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Mahwah Adversary Proceeding

PH LLP Client/Matter # 50687-00012
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$98,916.00
Costs incurred and advanced	350.90
Current Fees and Costs Due	\$99,266.90
Total Balance Due - Due Upon Receipt	\$99,266.90

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369638

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Mahwah Adversary Proceeding **\$98,916.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/02/2023		Analyze Bankruptcy Code section 542 on turning over real estate to the trustee	0.60	815.00	489.00
07/02/2023	NAB	Correspond with L. Despins and S. Maza regarding Mahwah complaint, proposed order, and DOJ stipulation issues (.2); analyze same (.4)	0.60	1,625.00	975.00
07/02/2023	SM29	Revise TRO motion and order to incorporate L. Despins comments (.4); correspond with N. Bassett re same (.2); analyze authority re same (.4)	1.00	1,320.00	1,320.00
07/03/2023	DEB4	Correspond with I. Goldman (Pullman) regarding DOJ stipulation	0.10	1,320.00	132.00
07/03/2023	DEB4	Correspond with S. Maza regarding Taurus P.200	0.10	1,320.00	132.00
07/03/2023	DEB4	Correspond with S. Maza regarding Mahwah issues	0.40	1,320.00	528.00
07/03/2023	DEB4	Correspond with S. Sarnoff regarding DOJ stipulation	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/03/2023	DEB4	Correspond with L. Despins regarding DOJ stipulation	0.10	1,320.00	132.00
07/03/2023	DEB4	Conference with regarding Bankruptcy Rule 7070	0.10	1,320.00	132.00
07/03/2023	DEB4	Correspond with J. Murray (DOJ) regarding DOJ stipulation	0.10	1,320.00	132.00
07/03/2023	DEB4	Conference with L. Despins and J. Murray (DOJ) regarding DOJ stipulation	0.20	1,320.00	264.00
07/03/2023	DEB4	Revise DOJ stipulation	0.40	1,320.00	528.00
07/03/2023	DEB4	Correspond with regarding Bankruptcy Rule 7070	0.10	1,320.00	132.00
07/03/2023	JK21	Research regarding Bankruptcy Code section 542 and Rule 7070 orders	0.80	540.00	432.00
07/03/2023	JK21	Review and revise Mahwah complaint	2.30	540.00	1,242.00
07/03/2023	JK21	Research regarding turnover orders for S. Maza	1.80	540.00	972.00
07/03/2023	LAD4	Review/edit DOJ stip (1.10); t/c J. Murray (DOJ) & D. Barron re: same (.20)	1.30	1,860.00	2,418.00
07/03/2023		Correspond with J. Kuo on filing preparation	0.10	815.00	81.50
07/03/2023		Conference with D. Barron regarding Bankruptcy Rule 7070 (.1); prepare memorandum on the scope and application of Bankruptcy Rule 7070 in relation to the Mahwah pleadings (1.8)	1.90	815.00	1,548.50
07/03/2023		Correspond with D. Barron on Bankruptcy Rule 7070 in relation with the Mahwah complaint	0.20	815.00	163.00
07/03/2023	SM29	Analyze case law and precedent re TROs (1.6); correspond with L. Despins re same (.4); revise same (.3)	2.30	1,320.00	3,036.00
07/05/2023	LAD4	Review/edit revised docs (1.70); t/c S. Maza re: same (.40)	2.10	1,860.00	3,906.00
07/05/2023	AEL2	Prepare comments on draft Mahwah complaint	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/05/2023		Review and revise the Mahwah adversary pleadings	1.80	815.00	1,467.00
07/05/2023	SM29	Call with L. Despins re TRO and Mahwah complaint (.4); revise same per his comments (.5)	0.90	1,320.00	1,188.00
07/06/2023	DEB4	Correspond with regarding DOJ photos	0.50	1,320.00	660.00
07/06/2023	DEB4	Correspond with S. Maza regarding Mahwah adversary proceeding filings	0.20	1,320.00	264.00
07/06/2023	JK21	Prepare exhibits to Mahwah complaint	1.20	540.00	648.00
07/06/2023	LAD4	Review/comment on exhibits to pleadings (1.30); t/c J. Iverson (USMS) re: TRO terms (.40); t/c S. Maza re: same (.20)	1.90	1,860.00	3,534.00
07/06/2023		Prepare NFSC videos cited in the Mahwah mansion complaint as exhibits	5.90	815.00	4,808.50
07/06/2023		Calls with S. Maza on the Mahwah adversary pleadings and evidentiary matters	0.30	815.00	244.50
07/06/2023		Revise exhibit list for the Mahwah complaint	0.40	815.00	326.00
07/06/2023		Review pictures of the Mahwah mansion shared by law enforcement	0.30	815.00	244.50
07/06/2023	NAB	Call with S. Maza regarding Mahwah complaint and TRO papers (.3); correspond with S. Maza regarding same (.3); analyze issues related to same (.3); call with F. Lawall (Troutman) regarding same (.3); follow-up correspondence with A. Luft regarding same and related issues (.6); review case law relating to same (.3); correspond with L. Despins regarding same (.2)	2.30	1,625.00	3,737.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	SM29	Call with N. Bassett re video evidence for Mahwah complaint (.3); calls with re same (.3); correspond with regarding same and Mahwah pleadings (.2); correspond with P. Linsey re Mahwah complaint (.3); review and prepare parts of Mahwah complaint and related documents (6.4); call with L. Despins re same (.2)	7.70	1,320.00	10,164.00
07/07/2023	DEB4	Correspond with regarding Roy Guo	0.10	1,320.00	132.00
07/07/2023	DEB4	Correspond with L. Despins regarding DOJ stipulation	0.20	1,320.00	264.00
07/07/2023	ECS1	Correspond with regarding filing of Mahwah adversary proceeding complaint	0.20	1,015.00	203.00
07/07/2023	JK21	Prepare exhibits to the Mahwah complaint	2.80	540.00	1,512.00
07/07/2023		Continue to prepare exhibits and video exhibits for the Mahwah complaint	0.70	815.00	570.50
07/07/2023	NAB	Review and revise draft Mahwah litigation papers (.6); correspond with S. Maza regarding same (.3)	0.90	1,625.00	1,462.50
07/07/2023	SM29	Review and revise Mahwah complaint and related pleadings (3.8); analyze evidentiary issues (1.2)	5.00	1,320.00	6,600.00
07/08/2023	DEB4	Correspond with S. Maza regarding Mahwah issues (0.1); correspond with L. Despins re: same (0.1)	0.20	1,320.00	264.00
07/09/2023		Review and revise pleadings for the Mahwah adversary proceeding	1.90	815.00	1,548.50
07/10/2023	DEB4	Conference with S. Maza regarding Mahwah adversary proceeding theories	0.30	1,320.00	396.00
07/10/2023	DEB4	Correspond with N. Bassett regarding call with DOJ	0.10	1,320.00	132.00
07/10/2023		Review and revise the Mahwah TRO motion	1.30	815.00	1,059.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/10/2023	SM29	Call with D. Barron re alter ego issues and DOJ call (.3); correspond with re TRO order in response to L. Despins comments (.1); revise same (.2)	0.60	1,320.00	792.00
07/11/2023	DEB4	Correspond with regarding Mahwah deed	0.20	1,320.00	264.00
07/11/2023	DEB4	Conference with S. Maza and J. Kuo regarding Mahwah complaint issue	0.30	1,320.00	396.00
07/11/2023	DEB4	Conference with J. Murray (DOJ), S. Maza and L. Despins regarding Mahwah complaint	0.40	1,320.00	528.00
07/11/2023	DEB4	Conference with S. Maza regarding Mahwah adversary proceeding filings and evidentiary issues (.1); analyze evidentiary issues and privilege related to same (.6)	0.70	1,320.00	924.00
07/11/2023	ECS1	Correspond with J. Kuo and P. Linsey (NPM) regarding filing of Mahwah adversary proceeding complaint	0.20	1,015.00	203.00
07/11/2023	JK21	Prepare pleadings and exhibits for filing Mahwah complaint under seal (3.4); telephone conference with S. Maza and D. Barron regarding filing complaint and related pleadings (0.3)	3.70	540.00	1,998.00
07/11/2023	LAD4	T/c J. Tyminski (USMS) re: next steps (.30); t/c J. Murray (DOJ) & S. Maza, D. Barron re: ownership of Mahwah (.40); follow-up with J. Murray re: stipulation (.10)	0.80	1,860.00	1,488.00
07/11/2023		Review and revise Mahwah complaint and TRO motion	2.30	815.00	1,874.50
07/11/2023	SM29	Call with L. Despins, D. Barron and DOJ re Mahwah complaint (.4); correspond with L. Despins re same (.1); review open issues to prepare for same (.2); correspond with N. Bassett re evidentiary issues and privilege in connection with Mahwah complaint (.2); call with D. Barron re same (.1); call with J. Kuo and D. Barron re same (.3); correspond with L. Despins re filing Mahwah complaint (.1)	1.40	1,320.00	1,848.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	DEB4	Correspond with S. Maza regarding declaration in connection with Mahwah exhibits	0.10	1,320.00	132.00
07/12/2023	DEB4	Revise DOJ stipulation (0.3); correspond with J. Murray (DOJ) regarding same (0.1)	0.40	1,320.00	528.00
07/12/2023	DEB4	Correspond with L. Despins regarding DOJ stipulation	0.20	1,320.00	264.00
07/12/2023	ECS1	Correspond with S. Maza and regarding filing of Mahwah adversary proceeding	0.10	1,015.00	101.50
07/12/2023	ECS1	Prepare amended exhibits and notice thereof in Mahwah adversary proceeding (1.8); correspond with S. Maza about same (.2)	2.00	1,015.00	2,030.00
07/12/2023	AEL2	Review appearance filing	0.10	1,625.00	162.50
07/12/2023	NAB	Correspond with W. Farmer and L. Despins regarding Mahwah litigation issues	0.20	1,625.00	325.00
07/12/2023	SM29	Call Clerk's office re docket and certain exhibits (.2); correspond with Clerk re same (.2); review docket and exhibits (.5); correspond with E. Sutton re same and notice of amended exhibits (.4); review same (.2); correspond with P. Linsey (CT counsel) and E. Sutton re filing same (.2); correspond with A. Bongartz re same (.1); correspond with L. Despins re same (.1)	1.90	1,320.00	2,508.00
07/13/2023	AB21	Correspond with L. Despins regarding security at Mahwah property	0.10	1,625.00	162.50
07/13/2023	LAD4	Meeting W. Farmer re: Mahwah take over (.50); t/c S. Batista (guidepost) re: security at Mahwah (.30)	0.80	1,860.00	1,488.00
07/13/2023	WCF	Call with L. Despins regarding enforcement of Mahwah TRO (.5); prepare follow up notes regarding same (.1)	0.60	1,235.00	741.00
07/17/2023	DEB4	Correspond with S. Maza regarding Mahwah service issues	0.20	1,320.00	264.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	SM29	Email U.S. Marshals re stipulation with DOJ	0.10	1,320.00	132.00
07/18/2023	ECS1	Correspond with S. Maza about service of TRO, summons, and complaint in Mahwah adversary proceeding (.1); correspond with about same (.1)	0.20	1,015.00	203.00
07/18/2023	LAD4	T/c J. Tyminski (USMS) re: modification to proposed order (.40); t/c S. Maza re: same (.40)	0.80	1,860.00	1,488.00
07/18/2023		Analyze service of the Mahwah pleadings and TRO under FRCP and Nevada law	2.10	815.00	1,711.50
07/18/2023		Correspond with S. Maza on service of papers to defendants under federal rules and Nevada law	0.20	815.00	163.00
07/18/2023	SM29	Review email from re service questions (.2); analyze same and related authority (1.8); review precedent from re same (.4); correspond with re same (.2)	2.60	1,320.00	3,432.00
07/18/2023	SM29	Correspond with L. Despins and re TRO, Marshals Service, and related comments and precedents (.2); call with L. Despins regarding comments on TRO (.4); prepare notice of same and revise TRO (.9)	1.50	1,320.00	1,980.00
07/19/2023	LAD4	Review/edit revised TRO order (.90); call W. Farmer and J. Tyminski (USMS) re: next steps (.30)	1.20	1,860.00	2,232.00
07/19/2023		Prepare revised proposed order regarding the TRO	1.40	815.00	1,141.00
07/19/2023	SM29	Prepare notice of revised proposed TRO and finalize for filing (.5); correspond with L. Despins and re same (.3); email Court re same (.1); email O'Melveny re Mahwah pleadings (.1)	1.00	1,320.00	1,320.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	WCF	Analyze authorities regarding TRO enforcement (1.6); draft issues list regarding same (.2); call with J. Tyminski (USMS) and L. Despins regarding Mahwah complaint (.3)	2.10	1,235.00	2,593.50
07/20/2023	LAD4	T/c J. Murray (DOJ) re: prior entry	0.20	1,860.00	372.00
07/21/2023	LAD4	T/c R. Stout (FBI), J. Tyminski (USMS) re: prior entry (.20); t/c J. Murray (DOJ) re: update on same (.20)	0.40	1,860.00	744.00
07/24/2023	WCF	Call with J. Tyminski, Agent Stout regarding Mahwah property layout (.3); correspond with L. Despins regarding same (.2)	0.50	1,235.00	617.50
07/25/2023		Analyze NFSC's live streaming activities in the Mahwah mansion and schedules of their live streaming	1.10	815.00	896.50
07/25/2023	WCF	Correspond with J. Tyminski regarding Mahwah property	0.10	1,235.00	123.50
Subtotal: B191 General Litigation			86.90		98,916.00
Total			86.90		98,916.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	9.50	1,860.00	17,670.00
NAB	Nicholas A. Bassett	Partner	4.00	1,625.00	6,500.00
AB21	Alex Bongartz	Of Counsel	0.10	1,625.00	162.50
AEL2	Luft, Avi E.	Of Counsel	0.40	1,625.00	650.00
SM29	Shlomo Maza	Associate	26.00	1,320.00	34,320.00
DEB4	Douglass E. Barron	Associate	5.80	1,320.00	7,656.00
WCF	Will C. Farmer	Associate	3.30	1,235.00	4,075.50
ECS1	Ezra C. Sutton	Associate	2.70	1,015.00	2,740.50
		Associate	22.50	815.00	18,337.50
JK21	Jocelyn Kuo	Paralegal	12.60	540.00	6,804.00

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00012
Invoice No. 2369638

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Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	Filing Fee - Ezra Sutton; 07/11/2023; Filing fees in connection with an adversary proceeding filed in the In re Kwok case			350.00
07/23/2023	Computer Search (Other)			0.90
Total Costs incurred and advanced				\$350.90
Current Fees and Costs				\$99,266.90
Total Balance Due - Due Upon Receipt				\$99,266.90



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369639

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Golden Spring Adversary Proceeding

PH LLP Client/Matter # 50687-00013

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$90,231.50

Costs incurred and advanced

1,194.85

Current Fees and Costs Due

\$91,426.35

Total Balance Due - Due Upon Receipt

\$91,426.35

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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200 Park Avenue
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September 7, 2023

Please Refer to
Invoice Number: 2369639

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Golden Spring Adversary Proceeding

PH LLP Client/Matter # 50687-00013

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$90,231.50

Costs incurred and advanced

1,194.85

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Luc Despins as Chapter 11 Trustee in the case of Ho
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 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369639

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Golden Spring Adversary Proceeding

\$90,231.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/05/2023	DEB4	Prepare parts of Golden Spring complaint	3.40	1,320.00	4,488.00
07/18/2023	DEB4	Prepare parts of Golden Spring complaint	7.80	1,320.00	10,296.00
07/19/2023	DEB4	Correspond with regarding complaint introduction	0.10	1,320.00	132.00
07/19/2023	DEB4	Correspond with regarding changes to Golden Spring complaint	0.30	1,320.00	396.00
07/19/2023	DEB4	Prepare parts of Golden Spring complaint	1.20	1,320.00	1,584.00
07/19/2023	DEB4	Correspond with regarding Golden Spring complaint	0.30	1,320.00	396.00
07/19/2023	DEB4	Analyze documents related to Golden Spring complaint	2.10	1,320.00	2,772.00
07/19/2023	LAD4	Review/edit complaint alter ego	1.70	1,860.00	3,162.00
07/19/2023		Review and prepare part of draft complaint against Golden Spring	2.50	815.00	2,037.50
07/20/2023	DEB4	Correspond with L. Despins regarding complaint (0.4); revise same (0.8); correspond with regarding same (0.2)	1.40	1,320.00	1,848.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00013
Invoice No. 2369639

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	LAD4	Review/edit re-draft of complaint	1.10	1,860.00	2,046.00
07/20/2023		Correspond with D. Barron regarding comments on the Golden Spring complaint	0.20	815.00	163.00
07/21/2023	DEB4	Prepare parts of Golden Spring complaint	1.00	1,320.00	1,320.00
07/21/2023	DEB4	Correspond with L. Despins regarding complaint	0.30	1,320.00	396.00
07/21/2023	DEB4	Correspond with regarding Golden Spring complaint	0.20	1,320.00	264.00
07/21/2023	DEB4	Correspond with A. Luft regarding Golden Spring complaint	0.10	1,320.00	132.00
07/21/2023	JK21	Correspond with E. Sutton regarding Golden Spring (New York) Ltd. entity status with the state of New York	0.30	540.00	162.00
07/21/2023	AEL2	Review documents to be used as exhibits	1.30	1,625.00	2,112.50
07/21/2023		Revise Golden Spring adversary complaint	1.00	815.00	815.00
07/22/2023	AEL2	Prepare parts of draft complaint against Golden Spring	4.90	1,625.00	7,962.50
07/23/2023	DEB4	Prepare parts of Golden Spring complaint	1.20	1,320.00	1,584.00
07/23/2023	DEB4	Correspond with A. Luft and N. Bassett regarding complaint	0.80	1,320.00	1,056.00
07/23/2023	DEB4	Conference with regarding complaint and exhibits	0.40	1,320.00	528.00
07/23/2023	DEB4	Correspond with A. Chon and S. Zhu regarding Hong Kong service	0.10	1,320.00	132.00
07/23/2023	DEB4	Correspond with regarding China Golden Spring	0.10	1,320.00	132.00
07/23/2023	DEB4	Correspond with S. Maza on turnover issues	0.20	1,320.00	264.00
07/23/2023	AEL2	Correspond with D. Barron and N. Bassett re: potential claims for complaint	0.40	1,625.00	650.00
07/23/2023		Prepare exhibits and revise citations for Golden Spring complaint	6.30	815.00	5,134.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00013
Invoice No. 2369639

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2023		Conference with D. Barron regarding comments on Golden Spring complaint and exhibits (.4); correspond with D. Barron regarding same (.1)	0.50	815.00	407.50
07/23/2023	NAB	Review and revise draft complaint (1.3); correspond with D. Barron and A. Luft regarding same (.3)	1.60	1,625.00	2,600.00
07/24/2023	DEB4	Correspond with regarding sealing motion	0.20	1,320.00	264.00
07/24/2023	DEB4	Correspond with regarding complaint exhibits	0.40	1,320.00	528.00
07/24/2023	DEB4	Revise sealing motion	0.60	1,320.00	792.00
07/24/2023	DEB4	Correspond with S. Zhu regarding Hong Kong service	0.10	1,320.00	132.00
07/24/2023	DEB4	Conferences with regarding Golden Spring complaint and motion to seal	0.60	1,320.00	792.00
07/24/2023	DEB4	Correspond with E. Sutton regarding sealing motion	0.10	1,320.00	132.00
07/24/2023	DEB4	Correspond with regarding exhibits to Golden Spring complaint	0.40	1,320.00	528.00
07/24/2023	DEB4	Correspond with L. Despins regarding complaint	0.20	1,320.00	264.00
07/24/2023	DEB4	Conferences with N. Bassett regarding complaint	0.20	1,320.00	264.00
07/24/2023	DEB4	Revise Golden Spring complaint	2.70	1,320.00	3,564.00
07/24/2023	DEB4	Conference with L. Despins regarding complaint	0.20	1,320.00	264.00
07/24/2023	ECS1	Prepare motion to seal complaint against Golden Spring (.2); correspond with D. Barron regarding same (.1)	0.30	1,015.00	304.50
07/24/2023	ECS1	Analyze authority regarding service of summons and complaint on foreign corporation in Hong Kong (1.3); prepare summary of findings regarding same (.9)	2.20	1,015.00	2,233.00
07/24/2023	JK21	Prepare redacted exhibits for Golden Spring complaint	2.30	540.00	1,242.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00013
Invoice No. 2369639

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023	LAD4	Final review/edit of complaint (.70); t/c D. Barron re: same (.20)	0.90	1,860.00	1,674.00
07/24/2023		Phone call with D. Barron on the motion to seal complaint against Golden Spring	0.30	815.00	244.50
07/24/2023		Prepare exhibits to be filed with Golden Spring complaint	5.80	815.00	4,727.00
07/24/2023		Prepare parts of Golden Spring complaint	3.20	815.00	2,608.00
07/24/2023		Phone call with D. Barron on the Golden Spring complaint exhibits and motion to seal	0.30	815.00	244.50
07/24/2023	NAB	Review Golden Spring adversary complaint (.2); correspond with D. Barron regarding same (.4); calls with D. Barron regarding same (.2); correspond with L. Despins regarding same (.1)	0.90	1,625.00	1,462.50
07/25/2023	DEB4	Correspond with A. Chan regarding Hong Kong service issues	0.10	1,320.00	132.00
07/25/2023	DEB4	Correspond with S. Sarnoff (OMM) regarding Golden Spring complaint	0.10	1,320.00	132.00
07/25/2023	DEB4	Correspond with N. Bassett regarding motion to seal (0.1); analyze same (0.5)	0.60	1,320.00	792.00
07/25/2023	DEB4	Revise Golden Spring complaint	0.80	1,320.00	1,056.00
07/25/2023	DEB4	Call with N. Bassett regarding complaint	0.10	1,320.00	132.00
07/25/2023	DEB4	Correspond with N. Bassett regarding protective order	0.20	1,320.00	264.00
07/25/2023	DEB4	Correspond with J. Kuo regarding filing of Golden Spring complaint	0.30	1,320.00	396.00
07/25/2023	DEB4	Call with E. Sutton regarding Hong Kong service issues	0.20	1,320.00	264.00
07/25/2023	ECS1	Call with D. Barron regarding service of summons and complaint on foreign corporation in Hong Kong	0.20	1,015.00	203.00
07/25/2023	ECS1	Correspond with D. Barron regarding complaint against Golden Spring	0.20	1,015.00	203.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00013
Invoice No. 2369639

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2023	JK21	Prepare Golden Spring complaint and exhibits for electronic filing (2.5); electronically file with the court complaint and exhibits (redacted and unredacted versions) (1.1)	3.60	540.00	1,944.00
07/25/2023		Review and revise exhibits to the Golden Spring complaint for filing	1.00	815.00	815.00
07/25/2023	NAB	Review draft complaint and motion to seal (.6); correspond with L. Despins and D. Barron regarding same and related issues (.3); call with D. Barron regarding same (.1)	1.00	1,625.00	1,625.00
07/27/2023	DEB4	Correspond with E. Sutton regarding Golden Spring service issues	0.30	1,320.00	396.00
07/27/2023	DEB4	Correspond with H. Claiborn (UST) regarding Golden Spring complaint	0.20	1,320.00	264.00
07/27/2023	DEB4	Correspond with J. Kuo regarding Golden Spring complaint	0.10	1,320.00	132.00
07/27/2023	DEB4	Correspond with D. Mohamed regarding Golden Spring complaint exhibits	0.10	1,320.00	132.00
07/27/2023	ECS1	Correspond with D. Barron and A. Chan regarding service of summons and complaint on foreign corporation in Hong Kong	1.20	1,015.00	1,218.00
07/27/2023		Review China Golden Spring corporate documents	0.70	815.00	570.50
07/28/2023	DEB4	Correspond with J. Murray (DOJ) regarding contempt decision	0.20	1,320.00	264.00
07/28/2023	ECS1	Review certificates of service in connection with Golden Spring adversary proceeding (.1); correspond with D. Barron and P. Linsey (NPM) regarding same (.2)	0.30	1,015.00	304.50
07/28/2023	ECS1	Review and comment on service of Golden Spring adversary proceeding (.6); correspond with D. Barron regarding same (.1)	0.70	1,015.00	710.50
07/31/2023	DEB4	Call with E. Sutton regarding Golden Spring service issues	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00013
Invoice No. 2369639

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/31/2023	ECS1	Review and comment on service of Golden Spring adversary proceeding (.8); call with D. Barron about the same (.1)	0.90	1,015.00	913.50
Subtotal: B191 General Litigation			77.90		90,231.50
Total			77.90		90,231.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	3.70	1,860.00	6,882.00
NAB	Nicholas A. Bassett	Partner	3.50	1,625.00	5,687.50
AEL2	Luft, Avi E.	Of Counsel	6.60	1,625.00	10,725.00
DEB4	Douglass E. Barron	Associate	30.10	1,320.00	39,732.00
ECS1	Ezra C. Sutton	Associate	6.00	1,015.00	6,090.00
		Associate	21.80	815.00	17,767.00
JK21	Jocelyn Kuo	Paralegal	6.20	540.00	3,348.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	Photocopy Charges	101.00	0.08	8.08
07/12/2023	Photocopy Charges	101.00	0.08	8.08
07/31/2023	Photocopy Charges	11,408.00	0.08	912.64
07/24/2023	Lexis/On Line Search			26.95
07/24/2023	Lexis/On Line Search			56.17
07/24/2023	Lexis/On Line Search			56.17
07/24/2023	Westlaw			71.33
07/25/2023	Westlaw			47.56
07/28/2023	Computer Search (Other)			0.36

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00013
Invoice No. 2369639

Page 7

07/31/2023	Search Fee - Companies Registry, Invoice# 20230731PT Dated 07/31/23, company search fee on 28 July 2023 for 1 company; requested by Ezra Sutton	6.79
07/31/2023	Computer Search (Other)	0.72
Total Costs incurred and advanced		\$1,194.85
Current Fees and Costs		\$91,426.35
Total Balance Due - Due Upon Receipt		\$91,426.35



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369640

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

HCHK Adversary Proceeding

PH LLP Client/Matter # 50687-00014
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$355,217.75
Costs incurred and advanced	1,333.94
Current Fees and Costs Due	\$356,551.69
Total Balance Due - Due Upon Receipt	\$356,551.69

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Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369640

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

HCHK Adversary Proceeding

PH LLP Client/Matter # 50687-00014
Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$355,217.75

Costs incurred and advanced

1,333.94

Current Fees and Costs Due

\$356,551.69

Total Balance Due - Due Upon Receipt

\$356,551.69

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Luc Despins as Chapter 11 Trustee in the case of Ho
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 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369640

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

HCHK Adversary Proceeding

\$355,217.75

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
07/11/2023	LAD4	Continue to review issues and prepare hearing outline (1.50); handle hearing on settlement and related discussions (4.10)	5.60	1,860.00	10,416.00
07/11/2023	AEL2	Attend part of rule 9019 hearing for HCHK	2.00	1,625.00	3,250.00
07/18/2023	LAD4	Continue to review issues and prepare hearing outline (1.20); handle hearing (3.10); t/c D. Barron re: same (.20)	4.50	1,860.00	8,370.00
07/18/2023	AEL2	Attend hearing re: HCHK settlement motion	2.20	1,625.00	3,575.00
Subtotal: B155 Court Hearings			14.30		25,611.00
B191 General Litigation					
07/03/2023	DEB4	Correspond with L. Despins regarding informant email on HCHK issues	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00014
Invoice No. 2369640

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/03/2023	ECS1	Correspond with N. Bassett, A. Luft, M. Pena (Norris McLaughlin) and B. Wisotsky (Norris McLaughlin) regarding G News and the HCHK adversary proceeding	0.30	1,015.00	304.50
07/03/2023	ECS1	Review invoices of expenses in connection with HCHK adversary settlement agreement (1.2); prepare summary of same (.5)	1.70	1,015.00	1,725.50
07/03/2023	KC27	Analyze case law regarding court's discretion in setting terms of injunction (.9); correspond with S. Maza regarding same (.2)	1.10	915.00	1,006.50
07/03/2023	NAB	Correspond with L. Despins and A. Luft regarding HCHK litigation and G News	0.30	1,625.00	487.50
07/05/2023	DEB4	Correspond with L. Despins regarding assignee counsel fees	0.10	1,320.00	132.00
07/05/2023	DEB4	Correspond with E. Sutton regarding assignee counsel fees	0.20	1,320.00	264.00
07/05/2023	ECS1	Call with A. Luft, M. Pena (Norris McLaughlin) and B. Wisotsky (Norris McLaughlin) regarding G News and the HCHK adversary proceeding	0.50	1,015.00	507.50
07/05/2023	ECS1	Continue to review invoices of expenses in connection with HCHK adversary settlement agreement (1.6); prepare summary of same (.6)	2.20	1,015.00	2,233.00
07/05/2023	KC27	Analyze case law regarding co-defendant standing post default judgment against defaulter	0.40	915.00	366.00
07/05/2023	AEL2	Analyze and comment on response to G Club objection to settlement motion	1.00	1,625.00	1,625.00
07/05/2023	AEL2	Meet and confer with counsel for G News and E. Sutton re: potential sale of assets	0.50	1,625.00	812.50
07/05/2023	NAB	Review draft motion to set answer deadline in HCHK litigation (.4); correspond with L. Despins and A. Luft regarding same (.3)	0.70	1,625.00	1,137.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00014
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	DEB4	Conference with A. Luft regarding HCHK reply in support of rule 9019 settlement motion	0.50	1,320.00	660.00
07/06/2023	DEB4	Correspond with M. Tsukerman (CS) regarding assignee expenses	0.20	1,320.00	264.00
07/06/2023	DEB4	Conference with K. Catalano regarding alter ego questions	0.20	1,320.00	264.00
07/06/2023	DEB4	Correspond with L. Despins regarding assignee expenses	0.30	1,320.00	396.00
07/06/2023	DEB4	Conference with P. Linsey (NPM) regarding HCHK issues	0.20	1,320.00	264.00
07/06/2023	DEB4	Correspond with regarding Himalaya activities	0.30	1,320.00	396.00
07/06/2023	DEB4	Conference with M. Tsukerman (CS) regarding HCHK reply in support of rule 9019 motion	0.30	1,320.00	396.00
07/06/2023	DEB4	Prepare reply in support of HCHK rule 9019 motion	8.30	1,320.00	10,956.00
07/06/2023	DEB4	Conference with J. Austin regarding research on entity documents	0.10	1,320.00	132.00
07/06/2023	ECS1	Correspond with D. Barron, P. Linsey (NPM), and A. Smith (Robinson Cole) regarding transcript of June 27, 2023 status conference in HCHK adversary proceeding	0.20	1,015.00	203.00
07/06/2023	ECS1	Analyze case law and statutory authority regarding non-party's standing to object to rule 9019 settlement agreement and application of rule 9019 factors to non-party (2.8); correspond with D. Barron about same (.4)	3.20	1,015.00	3,248.00
07/06/2023	ECS1	Review discovery documents in connection with Trustee's reply in support of rule 9019 motion in HCHK adversary proceeding (2.0); prepare summary of same for D. Barron and (1.2)	3.20	1,015.00	3,248.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	KC27	Analyze case law regarding standing of creditors of alter ego entity in adversary proceeding (5.1); conference with D. Barron regarding same (.2); analyze case law regarding non-party motion to intervene (1.7); analyze case law regarding standing pursuant to section 1109 of the Bankruptcy Code (2.4)	9.40	915.00	8,601.00
07/06/2023	AEL2	Analyze objections to the HCHK settlement motion	2.10	1,625.00	3,412.50
07/06/2023	AEL2	Call with D. Barron re: arguments for rule 9019 reply	0.50	1,625.00	812.50
07/06/2023		Review information on 133256 B.C. Ltd., GWGOPNZ Limited, Japan Himalaya League, Inc., Kalixun Trading Limited, and Shih Hsin Yu	1.60	815.00	1,304.00
07/06/2023		Analyze case law on identifying proper defendants for alter ego claims	1.20	815.00	978.00
07/07/2023	DEB4	Correspond with K. Catalano regarding alter ego findings	0.30	1,320.00	396.00
07/07/2023	DEB4	Call with A. Luft regarding HCHK reply in support of rule 9019 motion	0.40	1,320.00	528.00
07/07/2023	DEB4	Correspond with L. Despins regarding U.S. Trustee proposal in connection with rule 9019 order	0.10	1,320.00	132.00
07/07/2023	DEB4	Correspond with H. Claiborn (US Trustee) regarding rule 9019 order	0.10	1,320.00	132.00
07/07/2023	DEB4	Correspond with L. Despins regarding deed of assignments	0.10	1,320.00	132.00
07/07/2023	DEB4	Correspond with M. Tsukerman (CS) and R. Jareck (CS) regarding reply in support of rule 9019 motion	0.80	1,320.00	1,056.00
07/07/2023	DEB4	Correspond with M. Tsukerman regarding assignee expenses	0.10	1,320.00	132.00
07/07/2023	DEB4	Correspond with L. Despins regarding assignee expenses	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	DEB4	Prepare HCHK reply in support of rule 9019 motion	5.20	1,320.00	6,864.00
07/07/2023	DEB4	Correspond with E. Sutton regarding case law on rule 9019 standing	0.30	1,320.00	396.00
07/07/2023	DEB4	Correspond with regarding Yanchun Liu	0.20	1,320.00	264.00
07/07/2023	DEB4	Revise assignee filing re: rule 9019 motion	0.50	1,320.00	660.00
07/07/2023	DEB4	Correspond with M. Tsukerman regarding exculpation issue	0.10	1,320.00	132.00
07/07/2023	ECS1	Prepare reply in support of rule 9019 motion in HCHK adversary proceeding (3.3); analyze case law in connection with same (.6); prepare certificate of service regarding same (.3); correspond with D. Barron regarding rule 9019 reply brief, supporting case law, and service (.7)	4.90	1,015.00	4,973.50
07/07/2023	JK21	Review and comment on service of reply in support of rule 9019 motion	0.20	540.00	108.00
07/07/2023	KC27	Analyze case law regarding standing of alter ego entities' creditors and equity holders (4.8); correspond with D. Barron on same (.2)	5.00	915.00	4,575.00
07/07/2023	LAD4	Review HCHK response	0.80	1,860.00	1,488.00
07/07/2023	AEL2	Correspond with D. Barron re: arguments and comments for rule 9019 reply brief	1.90	1,625.00	3,087.50
07/07/2023	AEL2	Call with D. Barron re: arguments for rule 9019 reply brief	0.40	1,625.00	650.00
07/07/2023	AEL2	Draft parts of reply brief to objections to settlement motion	3.50	1,625.00	5,687.50
07/07/2023	AEL2	Review and comment on draft reply to objection to settlement motion	1.90	1,625.00	3,087.50
07/07/2023	AEL2	Analyze Himalaya objection to settlement motion	1.20	1,625.00	1,950.00
07/07/2023	AEL2	Call with Cole Schotz re: its rule 9019 reply brief, authority, and argument	0.90	1,625.00	1,462.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023		Analyze information related to 133256 B.C. Ltd. and its signatory Yanchun Liu	1.00	815.00	815.00
07/09/2023	DEB4	Correspond with N. Bassett and L. Despins regarding HCHK issues	0.40	1,320.00	528.00
07/09/2023	ECS1	Analyze case law on impact of rule 9019 settlement agreement on third parties	0.60	1,015.00	609.00
07/09/2023	NAB	Correspond with L. Despins regarding HCHK litigation issues and strategy (.2); analyze same (.3)	0.50	1,625.00	812.50
07/10/2023	DEB4	Conference with L. Despins, A. Luft, R. Jareck (CS), M. Tsukerman (CS) regarding rule 9019 hearing and plan for same	0.50	1,320.00	660.00
07/10/2023	DEB4	Correspond with S. Shelley regarding assignment issues	0.20	1,320.00	264.00
07/10/2023	DEB4	Correspond with L. Despins regarding rule 9019 hearing	0.20	1,320.00	264.00
07/10/2023	DEB4	Prepare documents for HCHK hearing on settlement agreement	2.40	1,320.00	3,168.00
07/10/2023	DEB4	Analyze HCHK documents in connection with rule 9019 motion and settlement	1.20	1,320.00	1,584.00
07/10/2023	DEB4	Correspond with M. Tsukerman (CS) regarding assignee expenses	0.10	1,320.00	132.00
07/10/2023	DEB4	Follow up conference with A. Luft regarding rule 9019 hearing prep	0.40	1,320.00	528.00
07/10/2023	DEB4	Correspond with L. Despins regarding Cole Schotz fees in connection with settlement	0.10	1,320.00	132.00
07/10/2023	DEB4	Correspond with E. Sutton regarding Cole Schotz fees in connection with settlement	0.20	1,320.00	264.00
07/10/2023	ECS1	Prepare documents and case annotations for 7/11/23 hearing in HCHK adversary proceeding (3.2); correspond with D. Barron about same (.3)	3.50	1,015.00	3,552.50
07/10/2023	JK21	Serve, electronically and by hard copy, rule 9019 reply brief	0.60	540.00	324.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/10/2023	LAD4	Review submissions, issues and prepare outline for Rule 9019 hearing (1.6); t/c R. Jareck (CS), M. Tsukerman (CS), D. Barron, A. Luft re: same (.5)	2.10	1,860.00	3,906.00
07/10/2023	AEL2	Call with N. Bassett re: HCHK arguments for rule 9019 settlement hearing	0.30	1,625.00	487.50
07/10/2023	AEL2	Call with D. Barron re: prep for tomorrow's hearing on rule 9019 motion	0.40	1,625.00	650.00
07/10/2023	AEL2	Review rule 9019 submissions in preparation for settlement hearing	2.40	1,625.00	3,900.00
07/10/2023	AEL2	Prepare notes for call with Cole Schotz regarding settlement motion and hearing	0.20	1,625.00	325.00
07/10/2023	AEL2	Call with L. Despins, D. Barron, R. Jareck (CS), M. Tsukerman (CS) re: arguments for rule 9019 settlement motion and hearing	0.50	1,625.00	812.50
07/10/2023	NAB	Correspond with A. Luft regarding hearing on HCHK issues and Hudson Diamond discovery issues (.2); call with A. Luft regarding same (.3)	0.50	1,625.00	812.50
07/11/2023	AB21	Correspond with L. Despins and D. Barron regarding revisions to proposed HCHK order	0.50	1,625.00	812.50
07/11/2023	DEB4	Correspond with L. Despins regarding rule 9019 hearing	0.20	1,320.00	264.00
07/11/2023	DEB4	Correspond with L. Despins regarding HCHK rule 9019 order	0.10	1,320.00	132.00
07/11/2023	DEB4	Conference with E. Sutton regarding assignee counsel fees	0.10	1,320.00	132.00
07/11/2023	DEB4	Correspond with A. Luft regarding assignee counsel fees	0.10	1,320.00	132.00
07/11/2023	DEB4	Correspond with L. Despins regarding HCHK assignee settlement	0.10	1,320.00	132.00
07/11/2023	DEB4	Correspond with R. Jareck (CS) regarding revised proposed rule 9019 order (0.2); correspond with E. Sutton regarding same (0.1)	0.30	1,320.00	396.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2023	DEB4	Correspond with E. Sutton regarding motion for answer deadline	0.10	1,320.00	132.00
07/11/2023	ECS1	Revise proposed rule 9019 order in connection with HCHK settlement agreement	0.50	1,015.00	507.50
07/11/2023	ECS1	Prepare Rule 7012 motion in HCHK adversary proceeding	0.50	1,015.00	507.50
07/11/2023	ECS1	Outline argument for 7/11/23 hearing in HCHK adversary proceeding (.7); correspond with D. Barron and A. Luft about same (.1); call with D. Barron regarding assignee counsel fees (.1)	0.90	1,015.00	913.50
07/11/2023	AEL2	Review submissions and case law in preparation for settlement hearing oral argument	1.10	1,625.00	1,787.50
07/11/2023	AEL2	Review and supplement outline for rule 9019 settlement hearing	2.70	1,625.00	4,387.50
07/11/2023	AEL2	Correspond with L. Despins and N. Bassett re: HCHK rule 9019 settlement hearing (.1); revise rule 9019 order (.1)	0.20	1,625.00	325.00
07/12/2023	DEB4	Conferences with E. Sutton regarding service issues	0.20	1,320.00	264.00
07/12/2023	DEB4	Conference with A. Luft regarding HCHK hearing on settlement motion and changes to proposed rule 9019 order	0.40	1,320.00	528.00
07/12/2023	DEB4	Revise rule 9019 order	0.30	1,320.00	396.00
07/12/2023	DEB4	Conference with A. Luft regarding revised rule 9019 order	0.10	1,320.00	132.00
07/12/2023	DEB4	Conference with E. Sutton regarding revised rule 9019 order	0.10	1,320.00	132.00
07/12/2023	ECS1	Analyze service issues in HCHK adversary proceeding (.9); call with D. Barron regarding same (.2)	1.10	1,015.00	1,116.50
07/12/2023	ECS1	Prepare revised proposed order on rule 9019 motion (.6); call with D. Barron about same (.1)	0.70	1,015.00	710.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	ECS1	Prepare Rule 7012 motion in HCHK adversary proceeding	0.40	1,015.00	406.00
07/12/2023	KC27	Analyze case law regarding impact of equitable ownership finding	1.00	915.00	915.00
07/12/2023	AEL2	Correspond with D. Barron re: revised terms of proposed HCHK rule 9019 order	0.20	1,625.00	325.00
07/12/2023	AEL2	Meet with D. Barron re: hearing and changes to proposed rule 9019 order in light of hearing	0.40	1,625.00	650.00
07/12/2023	AEL2	Call with D. Barron re: edits to proposed rule 9019 order to address U.S. Trustee concern	0.10	1,625.00	162.50
07/13/2023	DEB4	Call with E. Sutton regarding revised proposed rule 9019 order (0.1); prepare same (0.5); correspond with H. Claiborn (UST) and I. Goldman (Pullman) regarding same (.1); correspond with R. Jareck (CS) regarding same (0.1)	0.80	1,320.00	1,056.00
07/13/2023	DEB4	Correspond with L. Despins regarding revised proposed rule 9019 order	0.10	1,320.00	132.00
07/13/2023	DEB4	Revise DOJ stipulation (0.3); correspond with L. Despins regarding same (0.1); correspond with J. Murray (DOJ) regarding same (0.1)	0.50	1,320.00	660.00
07/13/2023	DEB4	Correspond with P. Linsey (NPM) regarding revised proposed Rule 9019 order	0.10	1,320.00	132.00
07/13/2023	ECS1	Prepare revised proposed order on rule 9019 motion (.7); call with D. Barron about same (.1)	0.80	1,015.00	812.00
07/13/2023	ECS1	Prepare Rule 7012 motion in HCHK adversary proceeding (.6); correspond with N. Bassett and P. Linsey (NPM) about same (.1)	0.70	1,015.00	710.50
07/13/2023	ECS1	Correspond with J. Kuo and D. Barron regarding service in HCHK adversary proceeding	0.40	1,015.00	406.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/13/2023	JK21	Prepare for filing proposed order regarding settlement agreement with assignee (0.3); electronically file with the court proposed order regarding settlement agreement with assignee (0.4); electronically serve proposed order regarding settlement agreement with assignee (0.2)	0.90	540.00	486.00
07/13/2023	KC27	Analyze case law regarding standing for substantive consolidation (1.9); correspond with D. Barron regarding same (.2)	2.10	915.00	1,921.50
07/13/2023	LAD4	Review/edit revised order	0.70	1,860.00	1,302.00
07/13/2023	AEL2	Correspond with P. Linsey and D. Barron re: process for service of revised rule 9019 order	0.10	1,625.00	162.50
07/13/2023	NAB	Correspond with P. Linsey (NPM) regarding adversary proceeding service issues	0.30	1,625.00	487.50
07/14/2023	DEB4	Correspond with E. Sutton regarding assignee documents	0.10	1,320.00	132.00
07/14/2023	DEB4	Correspond with K. Catalano regarding alter ego issues	0.30	1,320.00	396.00
07/14/2023	DEB4	Correspond with L. Despins and A. Luft regarding U.S. Trustee rule 9019 order objections	0.20	1,320.00	264.00
07/14/2023	DEB4	Correspond with R. Jareck (CS) regarding assignee documents	0.10	1,320.00	132.00
07/14/2023	DEB4	Conference with R. Jareck (CS) regarding rule 9019 order	0.20	1,320.00	264.00
07/14/2023	ECS1	Review service issues in HCHK adversary proceeding	0.10	1,015.00	101.50
07/14/2023	ECS1	Review and comment on service of Rule 7012 motion in HCHK adversary proceeding (.1); prepare certificate of service regarding same (.1)	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	JK21	Prepare certificate of service regarding pretrial scheduling order (0.6); electronically file with the court certificate of service regarding pretrial scheduling order (0.3)	0.90	540.00	486.00
07/14/2023	JK21	Review and comment on hard copy and electronic service of Rule 7012 motion	0.40	540.00	216.00
07/14/2023	LAD4	Conduct due diligence re: releases to assignee, et al (3.20); t/c and emails R. Jareck (CS) re: same (.50)	3.70	1,860.00	6,882.00
07/14/2023		Phone call with informant on the operation of farms, farm loan project, and companies associated with the farm	0.90	815.00	733.50
07/14/2023		Prepare memo on the operation and structure of farms, farm loan project, and HCHK's involvement in the loan project	2.00	815.00	1,630.00
07/14/2023		Review and summarize informant's email on HCHK and Yanchun Liu	0.50	815.00	407.50
07/16/2023	DEB4	Correspond with L. Despins regarding rule 9019 issues	0.10	1,320.00	132.00
07/17/2023	DEB4	Conference with A. Luft regarding HCHK rule 9019 issues (1.7); analyze submissions and cases for hearing related to same (2.3)	4.00	1,320.00	5,280.00
07/17/2023	DEB4	Correspond with E. Sutton regarding G-Club MSA	0.10	1,320.00	132.00
07/17/2023	DEB4	Conference with E. Sutton regarding reference materials for continued settlement hearing	0.40	1,320.00	528.00
07/17/2023	DEB4	Correspond with L. Despins regarding intervention motion	0.20	1,320.00	264.00
07/17/2023	DEB4	Conference with E. Sutton regarding service issues	0.20	1,320.00	264.00
07/17/2023	DEB4	Correspond with A. Luft regarding continued rule 9019 hearing	0.30	1,320.00	396.00
07/17/2023	DEB4	Conference with regarding Himalaya Farm witness	0.30	1,320.00	396.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	ECS1	Review submissions and related HCHK documents in preparation for hearing on revised proposed rule 9019 order in connection with HCHK settlement agreement (.3); conference with D. Barron regarding same (.4)	0.70	1,015.00	710.50
07/17/2023	ECS1	Review service issues in HCHK adversary proceeding (.1); conference with D. Barron regarding same (.2)	0.30	1,015.00	304.50
07/17/2023	JK21	Correspond with E. Sutton regarding rule 9019 order	0.30	540.00	162.00
07/17/2023	LAD4	Review submissions, issues and prepare outline for hearing (3.10); t/c R. Jareck (CS) re: same (.30)	3.40	1,860.00	6,324.00
07/17/2023	AEL2	Call with N. Bassett re: HCHK sur-objection	0.30	1,625.00	487.50
07/17/2023	AEL2	Analyze and comment on arguments in response to HCHK objections to rule 9019 settlement motion and order	1.20	1,625.00	1,950.00
07/17/2023	AEL2	Meet with D. Barron re: objection response and prep for continued rule 9019 hearing	1.70	1,625.00	2,762.50
07/17/2023	AEL2	Analyze objections to rule 9019 motion and proposed order	3.40	1,625.00	5,525.00
07/17/2023		Review loan agreements between HCHK and the intervenor entities	1.30	815.00	1,059.50
07/17/2023		Review corporate documents of 133256 B.C. Ltd.	0.30	815.00	244.50
07/17/2023		Phone call with D. Barron regarding the farm loan project and terms of the loan agreement	0.30	815.00	244.50
07/17/2023		Review documents on Relativity for information on Jing Wei Fang, former director of 133256 B.C. Ltd.	0.50	815.00	407.50
07/17/2023	NAB	Call with A. Luft regarding continued HCHK settlement hearing and related objection and discovery issues (.3); review documents related to same (.1)	0.40	1,625.00	650.00

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07/18/2023	DEB4	Conference with L. Despins regarding hearing on HCHK settlement motion	0.20	1,320.00	264.00
07/18/2023	DEB4	Conference with A. Luft regarding rule 9019 hearing arguments	0.20	1,320.00	264.00
07/18/2023	DEB4	Analyze corporate documents from purported HCHK creditors	0.30	1,320.00	396.00
07/18/2023	DEB4	Correspond with regarding purported HCHK creditors	0.20	1,320.00	264.00
07/18/2023	ECS1	Analyze authority regarding service via mail under Rule 7004(b)	0.70	1,015.00	710.50
07/18/2023	AEL2	Correspond with N. Bassett re: HCHK objection responses	0.30	1,625.00	487.50
07/18/2023	AEL2	Draft talking points for HCHK hearing on settlement motion (1.9); conference with D. Barron regarding same (.2)	2.10	1,625.00	3,412.50
07/18/2023	AEL2	Correspond with D. Barron, E. Sutton re: action items arising from rule 9019 hearing	0.30	1,625.00	487.50
07/18/2023		Review documents on Relativity for information on Chuxiong Sun and Kalixun Trading Limited	0.90	815.00	733.50
07/19/2023	DEB4	Correspond with K. Catalano regarding alter ego issues	0.10	1,320.00	132.00
07/19/2023	DEB4	Conference with L. Despins, N. Bassett, A Luft and E. Sutton regarding HCHK discovery	0.50	1,320.00	660.00
07/19/2023	DEB4	Review findings from K. Catalano regarding alter ego issues	0.30	1,320.00	396.00
07/19/2023	DEB4	Conference with A. Luft regarding HCHK issues and post-hearing items	0.60	1,320.00	792.00
07/19/2023	DEB4	Correspond with regarding Japan Himalaya	0.20	1,320.00	264.00
07/19/2023	DEB4	Correspond with E. Sutton regarding service issues	0.30	1,320.00	396.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	ECS1	Prepare requests for production, admissions and interrogatories for proposed intervenors in HCHK adversary proceeding (3.8); calls with about same (.4)	4.20	1,015.00	4,263.00
07/19/2023	ECS1	Call with L. Despins, N. Bassett, A. Luft and D. Barron regarding discovery in connection with HCHK adversary proposed intervenors	0.50	1,015.00	507.50
07/19/2023	ECS1	Correspond with D. Barron and A. Luft regarding meeting and conferring with proposed intervenors in HCHK adversary proceeding	0.20	1,015.00	203.00
07/19/2023	KC27	Analyze case law regarding standing for creditor of creditor (1.9); summarize same (.2); correspond with D. Barron regarding same (.1)	2.20	915.00	2,013.00
07/19/2023	LAD4	Review/comment on discovery issues re: intervenors (1.90); t/c D. Barron, N. Bassett, E. Sutton, A. Luft re: same (.50)	2.40	1,860.00	4,464.00
07/19/2023	AEL2	Draft parts of intervenor discovery	5.50	1,625.00	8,937.50
07/19/2023	AEL2	Call with D. Barron re: action items from the hearing	0.60	1,625.00	975.00
07/19/2023	AEL2	Meeting with L. Despins, N. Bassett, D. Barron and E. Sutton re: HCHK intervention discovery	0.50	1,625.00	812.50
07/19/2023	AEL2	Correspond with R. Jareck (CS) re: intervention evidence	0.40	1,625.00	650.00
07/19/2023	AEL2	Call with J. Sherman re: claim in HCHK	0.40	1,625.00	650.00
07/19/2023	AEL2	Correspond with Pastore firm re: intervention motion	0.20	1,625.00	325.00
07/19/2023	AEL2	Analyze intervention motion	0.90	1,625.00	1,462.50
07/19/2023		Prepare request for production, interrogatories, and request for admissions to the proposed intervenors (1.7); calls with E. Sutton regarding same (.4)	2.10	815.00	1,711.50
07/19/2023		Review corporate documents for Japanese Himalaya League, Inc.	0.20	815.00	163.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	NAB	Call with L. Despins, A. Luft, D. Barron, and E. Sutton regarding HCHK discovery (.5); begin reviewing draft discovery requests (.4)	0.90	1,625.00	1,462.50
07/20/2023	DEB4	Correspond with R. Jareck (CS) regarding CHOCK documents	0.20	1,320.00	264.00
07/20/2023	DEB4	Correspond with and E. Sutton regarding Xvebing Wang	0.10	1,320.00	132.00
07/20/2023	DEB4	Correspond with E. Sutton regarding CHOCK service list	0.10	1,320.00	132.00
07/20/2023	DEB4	Conference with A. Luft related to standing and interrogatories	0.60	1,320.00	792.00
07/20/2023	DEB4	Analyze HCHK loan documents (1.2); conferences with regarding same (0.3); prepare summary analysis regarding same (0.8)	2.30	1,320.00	3,036.00
07/20/2023	DEB4	Conference with A. Luft regarding intervention discovery	0.50	1,320.00	660.00
07/20/2023	DEB4	Conference with A. Luft, W. Farmer, N. Bassett, R. Pastore (Pastore) regarding intervention discovery	0.30	1,320.00	396.00
07/20/2023	DEB4	Call with E. Sutton regarding requests for admission	0.20	1,320.00	264.00
07/20/2023	DEB4	Analyze authorities regarding intervention discovery issues	0.80	1,320.00	1,056.00
07/20/2023	ECS1	Analyze authority on standards in connection with intervention in adversary proceeding (.5); draft summary of findings regarding same (.2)	0.70	1,015.00	710.50
07/20/2023	ECS1	Call with P. Linsey (NPM) regarding service in HCHK adversary proceeding	0.10	1,015.00	101.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	ECS1	Prepare requests for production, admissions, interrogatories, deposition notices and subpoenas for proposed intervenors in HCHK adversary proceeding (5.0); correspond with N. Bassett, W. Farmer, A. Luft and regarding same (.4); call with D. Barron regarding same (.2); further correspond with regarding same (.2)	5.80	1,015.00	5,887.00
07/20/2023	AEL2	Meet and confer with R. Pastore, N. Bassett, D. Barron, W. Farmer re: intervention discovery	0.30	1,625.00	487.50
07/20/2023	AEL2	Call with D. Barron re: underlying HCHK loan documents	0.60	1,625.00	975.00
07/20/2023	AEL2	Review issues and notes to prepare for meet and confer with R. Pastore	0.40	1,625.00	650.00
07/20/2023	AEL2	Call with N. Bassett re: HCHK meet and confer follow up analysis	0.30	1,625.00	487.50
07/20/2023	AEL2	Call with D. Barron re: Rule 26 and HCHK intervention	0.50	1,625.00	812.50
07/20/2023	AEL2	Prepare parts of discovery requests and subpoenas	3.70	1,625.00	6,012.50
07/20/2023	AEL2	Correspond with E. Sutton re: edits to requests for admission	0.30	1,625.00	487.50
07/20/2023		Review and prepare memo on the HCHK loan agreements with the proposed intervenors (1.6); calls with D. Barron regarding same (.3)	1.90	815.00	1,548.50
07/20/2023		Prepare request for production, interrogatories, and request for admissions to the proposed intervenors	1.00	815.00	815.00
07/20/2023		Prepare notices of deposition and subpoenas to the proposed intervenors, each signatory, and Xuebing Wang	3.10	815.00	2,526.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	NAB	Review and revise draft discovery requests on proposed intervenors (.9); correspond with E. Sutton, , A. Luft regarding same (.2); call with A. Luft regarding same (.3); call with D. Barron, A. Luft, W. Farmer, and opposing counsel regarding same (.3); correspond with A. Luft, W. Farmer regarding authority and analysis related to discovery requests (.2); further review draft discovery requests (.4)	2.30	1,625.00	3,737.50
07/20/2023	WCF	Meet and confer with Pastore LLP, A. Luft, N. Bassett, D. Barron regarding HCHK discovery and motion to intervene (.3); review, revise HCHK adversary proceeding discovery (.4)	0.70	1,235.00	864.50
07/20/2023	WCF	Review motion to intervene arguments	0.30	1,235.00	370.50
07/21/2023	DEB4	Correspond with R. Jareck regarding HCHK documents	0.10	1,320.00	132.00
07/21/2023	DEB4	Correspond with regarding Xvebing Wang	0.30	1,320.00	396.00
07/21/2023	DEB4	Correspond with A. Luft and L. Despins regarding HCHK witnesses	0.20	1,320.00	264.00
07/21/2023	DEB4	Conference with R. Jareck regarding Sherman claim	0.50	1,320.00	660.00
07/21/2023	ECS1	Prepare requests for production, admissions, interrogatories, deposition notices and subpoenas for proposed intervenors in HCHK adversary proceeding (2.8); correspond with N. Bassett, W. Farmer, A. Luft and regarding same (.2)	3.00	1,015.00	3,045.00
07/21/2023	LAD4	Review/edit proposed discovery	0.90	1,860.00	1,674.00
07/21/2023	AEL2	Draft intervention discovery	2.80	1,625.00	4,550.00
07/21/2023	AEL2	Correspond with N. Bassett re: intervenors	0.60	1,625.00	975.00
07/21/2023	AEL2	Correspond with E. Sutton re: service issues	0.50	1,625.00	812.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/21/2023		Review HCHK loan agreement and Xuebing Wang's power of attorney agreement	1.20	815.00	978.00
07/21/2023		Prepare rule 30(b)(6) deposition notices to each intervenor party and notice to Xuebing Wang	2.30	815.00	1,874.50
07/21/2023	NAB	Correspond with A. Luft regarding draft discovery requests (.4); review same (.1)	0.50	1,625.00	812.50
07/21/2023	WCF	Correspond with N. Bassett and criminal counsel to Debtor and Y. Wang regarding discovery for motion to intervene	0.40	1,235.00	494.00
07/23/2023	DEB4	Correspond with W. Farmer regarding discovery issues and related case law	0.10	1,320.00	132.00
07/23/2023	DEB4	Correspond with Xuebing Wang regarding Xuebing Wang	0.10	1,320.00	132.00
07/23/2023		Correspond with informant on farm loan program and form loan agreement	0.50	815.00	407.50
07/23/2023		Review form loan agreement, addendum, and farm qualification document from informant	0.60	815.00	489.00
07/24/2023	DEB4	Correspond with L. Despins, N. Bassett and A. Luft regarding Holy City answer deadline	0.10	1,320.00	132.00
07/24/2023	ECS1	Analyze case law regarding application of standards in connection with intervention in adversary proceeding	0.30	1,015.00	304.50
07/24/2023	ECS1	Correspond with P. Linsey (NPM) regarding order setting answer deadline for Holy City and certificate of service regarding same (.2); review certificate of service regarding same (.2)	0.40	1,015.00	406.00
07/24/2023	ECS1	Review correspondence with defense counsel regarding requests for production, admissions, interrogatories, deposition notices and subpoenas for proposed intervenors in HCHK adversary proceeding (.1); correspond with L. Despins and N. Bassett about same (.1)	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2023		Review information on entities owned by Yanchun Liu in connection with the HCHK intervenors	0.30	815.00	244.50
07/24/2023	NAB	Correspond with W. Farmer regarding HCHK intervenor discovery (.3); review complaint and discovery matters in preparation for calls with opposing counsel (.4); call with Debtor's counsel and W. Farmer regarding deposition of Debtor (.3); call with Y. Wang counsel and W. Farmer regarding deposition of Y. Wang (.3); call with W. Farmer regarding same (.1); correspond with L. Despins regarding same (.1)	1.50	1,625.00	2,437.50
07/24/2023	WCF	Call with Kwok criminal counsel and N. Bassett regarding discovery related to motion to intervene (.3); follow-up call with N. Bassett regarding same (.1); call with Y. Wang criminal counsel and N. Bassett regarding same (.3)	0.70	1,235.00	864.50
07/25/2023	DEB4	Correspond with Himalaya entities regarding	0.20	1,320.00	264.00
07/25/2023	DEB4	Correspond with D. Smith (DLA) regarding HCHK documents	0.10	1,320.00	132.00
07/25/2023	DEB4	Analyze case law on intervention issues	2.50	1,320.00	3,300.00
07/25/2023	DEB4	Correspond with N. Bassett regarding motion to modify TRO	0.50	1,320.00	660.00
07/25/2023	DEB4	Correspond with R. Jareck (CS) regarding HCHK documents	0.20	1,320.00	264.00
07/25/2023	DEB4	Analyze motion to modify TRO (0.5); correspond with L. Despins regarding same (0.1); correspond with R. Jareck (CS) regarding same (0.1)	0.70	1,320.00	924.00
07/25/2023	DEB4	Correspond with N. Bassett regarding email to R. Pastore	0.30	1,320.00	396.00
07/25/2023	DEB4	Conference with A. Tsukerman (CS) regarding HCHK documents	0.40	1,320.00	528.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2023	DEB4	Correspond with M. Tsukerman (CS) regarding HCHK documents	0.10	1,320.00	132.00
07/25/2023	DEB4	Conference with S. Placona (MSB) regarding HCHK documents	0.20	1,320.00	264.00
07/25/2023	ECS1	Analyze authority regarding service of subpoena on individual in New Zealand and entity in Hong Kong (1.1); draft summary of findings regarding same for N. Bassett (.4)	1.50	1,015.00	1,522.50
07/25/2023	ECS1	Review correspondence with defense counsel regarding requests for production, admissions, interrogatories, deposition notices and subpoenas for proposed intervenors in HCHK adversary proceeding	0.20	1,015.00	203.00
07/25/2023	ECS1	Review proposed intervenors' motion to modify the TRO (.1); review local district court rules in connection with same (.1); correspond with D. Barron and N. Bassett regarding same (.1)	0.30	1,015.00	304.50
07/25/2023	LAD4	Review/edit automatic stay arguments re: intervenors' motion and related issues	2.90	1,860.00	5,394.00
07/25/2023		Correspond with D. Barron on informant's email	0.20	815.00	163.00
07/25/2023		Phone call with potential witness on his background	0.40	815.00	326.00
07/25/2023		Phone call with informant on the GTV private placement, the farm loan program, and the proposed intervenors	0.60	815.00	489.00
07/25/2023		Prepare motion to authorize and compel discovery on proposed intervenors	2.50	815.00	2,037.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2023	NAB	Correspond with W. Farmer, D. Barron regarding third party discovery requests to Debtor and Y. Wang regarding motion to intervene (.5); draft list of questions for same (.8); review complaint in connection with same (.4); analyze authority relating to same (.4); correspond with opposing intervenors' counsel regarding discovery issues (.3); prepare detailed outline of motion to authorize and compel discovery (.8); correspond with W. Farmer regarding same (.1)	3.30	1,625.00	5,362.50
07/25/2023	NAB	Review motion to modify TRO (.4); analyze response arguments (.4); correspond with L. Despins regarding same (.3)	1.10	1,625.00	1,787.50
07/25/2023	WCF	Review, revise draft motion for expedited discovery regarding motion to intervene	0.60	1,235.00	741.00
07/26/2023	DEB4	Analyze motion to compel discovery	0.50	1,320.00	660.00
07/26/2023	DEB4	Correspond with N. Bassett regarding HCHK litigation strategy	0.30	1,320.00	396.00
07/26/2023	ECS1	Analyze case law regarding application of standards related to discovery in connection with intervention in adversary proceeding (.6); prepare motion authorizing and compelling compliance with discovery (2.0); correspond with N. Bassett, W. Farmer, and P. Linsey (NPM) regarding same (.3); call with P. Linsey (NPM) regarding same (.1)	3.00	1,015.00	3,045.00
07/26/2023		Review draft motion to compel discovery on proposed intervenors and affiliated parties	0.50	815.00	407.50
07/26/2023		Prepare summary of informant's email on HCHK entities, proposed intervenors and related parties	0.50	815.00	407.50
07/26/2023		Prepare draft rule 26(d)(1) motion to compel discovery on the proposed intervenors	2.10	815.00	1,711.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	NAB	Review and revise draft motion to authorize and compel discovery (1.5); correspond with W. Farmer, regarding same (4); further review and revise same and ancillary documents (.3)	2.20	1,625.00	3,575.00
07/26/2023	NAB	Correspond with D. Barron regarding HCHK adversary proceeding strategy	0.30	1,625.00	487.50
07/26/2023	WCF	Analyze authorities regarding expedited discovery and non-subpoena discovery on non-parties (1.8); review, revise rule 26(d)(1) expedited discovery motion (1.3)	3.10	1,235.00	3,828.50
07/27/2023	LAD4	Review/edit motion to compel discovery of HCHK intervenors (1.40); long email to W. Farmer re: same (.50)	1.90	1,860.00	3,534.00
07/27/2023		Review Xuebing Wang's video and his comments regarding his control of companies	0.40	815.00	326.00
07/27/2023		Prepare summary of informant's email on HCHK entities and Kwok associates	1.00	815.00	815.00
07/27/2023	NAB	Correspond with W. Farmer regarding discovery issues (.3); correspond with W. Farmer regarding same (.2); review and revise written questions for deposition (.8); correspond with Y. Wang counsel regarding potential deposition (.2); correspond with Debtor's counsel regarding same (.1); review discovery authorization motion (.2)	1.80	1,625.00	2,925.00
07/27/2023	WCF	Draft written deposition questions regarding Yvette Wang testimony	0.90	1,235.00	1,111.50
07/28/2023	DEB4	Analyze rule 9019 order (0.4); call with E. Sutton regarding same (0.1); correspond with R. Jareck (CS) regarding same (0.1); correspond with P. Linsey regarding same (0.1)	0.70	1,320.00	924.00
07/28/2023	ECS1	Review and compare issued rule 9019 order with proposed order (.1); correspond with D. Barron regarding same (.1); call with D. Barron regarding same (.1)	0.30	1,015.00	304.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/28/2023	LAD4	Review Judge Manning order re: discovery (.20); emails to/from N. Bassett, P. Linsey (NPM) re: same (.30)	0.50	1,860.00	930.00
07/28/2023	NAB	Review order on motion to expedite discovery motion (.1); correspond with P. Linsey (NPM) regarding same (.1)	0.20	1,625.00	325.00
07/29/2023	DEB4	Correspond with J. Murray (DOJ) regarding discovery motion (0.1); correspond with N. Bassett and A. Luft regarding court's order on scheduling discovery and intervention motion (0.1)	0.20	1,320.00	264.00
07/30/2023		Review emails and documents from informants on HCHK intervenors and HCHK transactions	3.00	815.00	2,445.00
07/31/2023	DEB4	Review and comment on intervenor discovery issues	1.20	1,320.00	1,584.00
07/31/2023	KC27	Review order approving settlement	0.20	915.00	183.00
07/31/2023	AEL2	Correspond with D. Barron re: G Club response brief	0.60	1,625.00	975.00
07/31/2023		Correspond with D. Barron on Tokyo informant and HCHK intervenors	0.40	815.00	326.00
07/31/2023		Correspond with informant in Tokyo on Shuai Guo and Japan Himalaya League, Inc.	0.30	815.00	244.50
Subtotal: B191 General Litigation			255.90		324,277.50

B195 Non-Working Travel

07/11/2023	AEL2	Travel to hearing on HCHK settlement motion in Bridgeport, CT from NY (Bill at 1/2 rate)	1.40	812.50	1,137.50
07/11/2023	AEL2	Travel back from hearing on HCHK settlement motion in Bridgeport, CT to NY (Bill at 1/2 rate)	1.90	812.50	1,543.75
07/18/2023	LAD4	Travel to/from courthouse for hearing (Bill at 1/2 rate)	1.10	930.00	1,023.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	AEL2	Travel to HCHK settlement hearing in Bridgeport, CT from NY (Bill at 1/2 rate)	2.00	812.50	1,625.00
Subtotal: B195 Non-Working Travel			6.40		5,329.25
Total			276.60		355,217.75

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despina	Partner	29.40	1,860.00	54,684.00
LAD4	Luc A. Despina	Partner	1.10	930.00	1,023.00
NAB	Nicholas A. Bassett	Partner	16.80	1,625.00	27,300.00
AB21	Alex Bongartz	Of Counsel	0.50	1,625.00	812.50
AEL2	Luft, Avi E.	Of Counsel	55.10	1,625.00	89,537.50
AEL2	Luft, Avi E.	Of Counsel	5.30	812.50	4,306.25
DEB4	Douglas E. Barron	Associate	52.40	1,320.00	69,168.00
WCF	Will C. Farmer	Associate	6.70	1,235.00	8,274.50
ECS1	Ezra C. Sutton	Associate	49.00	1,015.00	49,735.00
KC27	Kristin Catalano	Associate	21.40	915.00	19,581.00
		Associate	35.60	815.00	29,014.00
JK21	Jocelyn Kuo	Paralegal	3.30	540.00	1,782.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	Photocopy Charges	202.00	0.08	16.16
07/23/2023	Photocopy Charges	6,816.00	0.08	545.28
07/06/2023	Westlaw			47.56
07/09/2023	Westlaw			23.78
07/10/2023	Computer Search (Other)			3.60
07/12/2023	Westlaw			54.75

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07/13/2023	Postage/Express Mail - First Class - US;	19.60
07/13/2023	Postage/Express Mail - First Class - US;	4.14
07/18/2023	Westlaw	23.78
07/19/2023	Westlaw	23.78
07/20/2023	Lexis/On Line Search	53.90
07/20/2023	Westlaw	50.87
07/24/2023	Lexis/On Line Search	168.51
07/24/2023	Postage/Express Mail - First Class - US;	50.25
07/24/2023	Postage/Express Mail - First Class - US;	58.80
07/24/2023	Postage/Express Mail - First Class - US;	58.80
07/24/2023	Postage/Express Mail - International;	58.80
07/24/2023	Postage/Express Mail - First Class - US;	9.80
07/24/2023	Computer Search (Other)	0.63
07/25/2023	Computer Search (Other)	0.90
07/26/2023	Westlaw	23.77
07/28/2023	Computer Search (Other)	1.08
07/31/2023	Search Fee - Companies Registry, Invoice# 20230731PT Dated 07/31/23, company search fee on 7 July 2023 for 1 company; requested by Ezra Sutton	7.05
07/31/2023	Articles and Publications - Javii Austin; 07/17/2023; International Transaction Fee - Corporate Summary Request for E. Sutton.; Merchant: International transaction	0.07
07/31/2023	Articles and Publications - Javii Austin; 07/17/2023; International Transaction Fee - Corporate Summary Request for E. Sutton.; Merchant: International transaction	0.35
07/31/2023	Articles and Publications - Javii Austin; 07/17/2023; Corporate Summary Request for E. Sutton.; Merchant: Small business bc; Orig Curr: CAD, Rate: 0.76, Orig Amt: 30.45	23.14

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07/31/2023	Articles and Publications - Javii Austin;	4.79
	07/17/2023; Corporate Summary Request for E. Sutton.; Merchant: Small business bc; Orig Curr: CAD, Rate: 0.76, Orig Amt: 6.30	
Total Costs incurred and advanced		\$1,333.94
Current Fees and Costs		\$356,551.69
Total Balance Due - Due Upon Receipt		\$356,551.69



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369641

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Interpleader Adversary Proceeding

PH LLP Client/Matter # 50687-00015

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$24,050.00

Costs incurred and advanced

1,042.24

Current Fees and Costs Due

\$25,092.24

Total Balance Due - Due Upon Receipt

\$25,092.24

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369641

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Interpleader Adversary Proceeding

PH LLP Client/Matter # 50687-00015
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$24,050.00
Costs incurred and advanced	1,042.24
Current Fees and Costs Due	\$25,092.24
Total Balance Due - Due Upon Receipt	\$25,092.24

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 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369641

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Interpleader Adversary Proceeding

\$24,050.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
07/11/2023	NAB	Participate in hearing on HK USA interpleader action and related matters	4.10	1,625.00	6,662.50
Subtotal: B155 Court Hearings			4.10		6,662.50
B191 General Litigation					
07/06/2023	NAB	Review response brief and outline for reply brief in support of HK USA interpleader summary judgment (.4); email with P. Linsey (NPM) regarding same (.1)	0.50	1,625.00	812.50
07/07/2023	NAB	Review and revise draft reply in support of HK USA interpleader summary judgment (.7); correspond and call with P. Linsey regarding same (.3)	1.00	1,625.00	1,625.00
07/09/2023	NAB	Review submissions to prepare for hearing on HK USA interpleader and additional matters	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00015
Invoice No. 2369641

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/09/2023	NAB	Review submissions and prepare notes for hearing on HK USA interpleader and related issues	0.40	1,625.00	650.00
07/10/2023	NAB	Review submissions and prepare hearing notes for HK USA interpleader action hearing (2.2); analyze issues and case law relating to same (1.8); analyze HCHK hearing issues (.4)	4.40	1,625.00	7,150.00
07/11/2023	NAB	Continue reviewing submissions and preparing hearing notes for hearing on HK USA interpleader action motion for summary judgment (2.8); analyze additional cases in connection with same (.7); correspond with L. Despins regarding same (.3); correspond with A. Luft regarding same and related hearing issues (.2)	4.00	1,625.00	6,500.00
Subtotal: B191 General Litigation			10.70		17,387.50
Total			14.80		24,050.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	14.80	1,625.00	24,050.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	Airfare - Nick Bassett; 07/10/2023; From/To: DCA/LGA; Airfare Class: Economy; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)			601.40

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00015
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Page 3

07/19/2023	Travel Expense - Meals - Nick Bassett; 07/11/2023; Restaurant: Mystik Masala; City: New York; Dinner; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	12.38
07/19/2023	Travel Expense - Meals - Nick Bassett; 07/11/2023; Restaurant: Lebanese Taverna Express; City: New York; Lunch; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	6.57
07/19/2023	Travel Expense - Meals - Nick Bassett; 07/12/2023; Restaurant: LGA Hunt and Fish Club; City: New York; Lunch; Number of people: 1; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	8.95
07/19/2023	Lodging - Nick Bassett; 07/12/2023; Hotel: Hyatt; City: New York; Check-in date: 07/11/2023; Check-out date: 07/12/2023; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	230.67
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/12/2023; From/To: DCA/Home; Service Type: Uber; Time: 19:24; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	10.45
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/11/2023; From/To: LGA/Meeting in CT; Service Type: Uber; Time: 09:25; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	108.34
07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/12/2023; From/To: PH/LGA; Service Type: Uber; Time: 14:15; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	38.49

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
 50687-00015
 Invoice No. 2369641

Page 4

07/19/2023	Taxi/Ground Transportation - Nick Bassett; 07/11/2023; From/To: home/DCA; Service Type: Uber; Time: 06:45; Travel to NY/CT to meet with client (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	9.99
07/19/2023	Travel Expense - Internet - Nick Bassett; 07/11/2023; Travel to NY/CT to meet with client; Inflight Wi-Fi (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	7.50
07/19/2023	Travel Expense - Internet - Nick Bassett; 07/11/2023; Travel to NY/CT to meet with client; Inflight Wi-Fi (Bill 1/2 to Matter 2 and 1/2 to Matter 15 as purpose of travel included both matters)	7.50
Total Costs incurred and advanced		\$1,042.24
Current Fees and Costs		\$25,092.24
Total Balance Due - Due Upon Receipt		\$25,092.24



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Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369642

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Mei Guo Adversary Proceeding

PH LLP Client/Matter # 50687-00016

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$42,793.50

Current Fees and Costs Due

\$42,793.50

Total Balance Due - Due Upon Receipt

\$42,793.50

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200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369642

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Mei Guo Adversary Proceeding

PH LLP Client/Matter # 50687-00016
Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$42,793.50

Current Fees and Costs Due

\$42,793.50

Total Balance Due - Due Upon Receipt

\$42,793.50

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 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369642

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Mei Guo Adversary Proceeding **\$42,793.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/06/2023	ECS1	Correspond with A. Luft regarding complaint and proposed preliminary injunction order in Mei Guo adversary proceeding	0.10	1,015.00	101.50
07/07/2023	DEB4	Correspond with E. Sutton and A. Luft regarding Mei Guo answer	0.10	1,320.00	132.00
07/07/2023	ECS1	Prepare initial disclosures in Mei Guo adversary proceeding (.3); correspond with D. Barron and W. Farmer about same (.1)	0.40	1,015.00	406.00
07/07/2023	ECS1	Correspond with A. Luft and D. Barron regarding sealed complaint and exhibits and proposed preliminary injunction order in Mei Guo adversary proceeding (.2); review submissions in connection with same (.2)	0.40	1,015.00	406.00
07/07/2023	AEL2	Correspond with N. Bassett re: next steps in adversary proceeding and summary judgment	0.30	1,625.00	487.50
07/10/2023	DEB4	Correspond with L. Despins regarding preliminary injunction issues in _____ adversary proceeding	0.10	1,320.00	132.00

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00016
Invoice No. 2369642

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2023	JK21	Prepare reference materials for preliminary injunction hearing for L. Despina	1.60	540.00	864.00
07/13/2023	DEB4	Correspond with N. Bassett regarding preliminary injunction	0.10	1,320.00	132.00
07/13/2023	ECS1	Prepare proposed pretrial schedule for Mei Guo adversary proceeding and trial	0.50	1,015.00	507.50
07/13/2023	ECS1	Prepare joint pretrial order in Mei Guo adversary proceeding (.7); call with P. Linsey (NPM) regarding same (.1); correspond with J. Moriarty (Zeisler) about same (.1)	0.90	1,015.00	913.50
07/13/2023	AEL2	Analyze pre-trial plan and schedule	0.80	1,625.00	1,300.00
07/13/2023	AEL2	Revise pre-trial order	0.50	1,625.00	812.50
07/13/2023	AEL2	Correspond with N. Bassett re: draft pre-trial plan and schedule	0.30	1,625.00	487.50
07/13/2023	NAB	Review and provide comments on draft pretrial order	0.30	1,625.00	487.50
07/14/2023	ECS1	Prepare joint pretrial order in Mei Guo adversary proceeding (.2); correspond with N. Bassett and P. Linsey of NPM regarding same (.1)	0.30	1,015.00	304.50
07/16/2023	NAB	Email with P. Linsey (NPM) regarding discovery schedule (.1); review and consider proposed schedule (.3)	0.40	1,625.00	650.00
07/17/2023	AEL2	Review scheduling issues and notes to prepare for meet & confer (.2); meet and confer with N. Bassett, counsel for M. Guo re: hearing schedule and PI (.6)	0.80	1,625.00	1,300.00
07/17/2023	NAB	Call with A. Romney (Zeisler), A. Luft regarding schedule for adversary proceeding and preliminary injunction issue (.6); correspond with L. Despina regarding same (.1)	0.70	1,625.00	1,137.50
07/18/2023	DM26	File via the Court's CM/ECF system proposed pretrial order in Despina v. Mei Guo case	0.20	540.00	108.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00016
Invoice No. 2369642

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2023	DEB4	Conference with P. Linsey (NPM) regarding scheduling order	0.20	1,320.00	264.00
07/18/2023	DEB4	Correspond with J. Kuo regarding scheduling order (0.1); correspond with D. Mohamed regarding same (0.3); revise same (0.1)	0.50	1,320.00	660.00
07/18/2023	ECS1	Review and comment on proposed pretrial order in Mei Guo adversary proceeding and filing of same	0.20	1,015.00	203.00
07/18/2023	AEL2	Analysis re: proposed litigation schedule	0.40	1,625.00	650.00
07/18/2023	NAB	Review proposed scheduling order (.4); correspond with A. Luft and P. Linsey (NPM) regarding same (.2); revise proposed schedule (.2); email with J. Moriarty (Zeisler) regarding same (.1)	0.90	1,625.00	1,462.50
07/19/2023	DEB4	Correspond with P. Linsey (NPM) regarding service issues on schedules	0.10	1,320.00	132.00
07/23/2023	DEB4	Correspond with E. Sutton on initial disclosures	0.20	1,320.00	264.00
07/24/2023	DEB4	Correspond with E. Sutton regarding initial disclosures (0.2); call with E. Sutton regarding same (0.2)	0.40	1,320.00	528.00
07/24/2023	ECS1	Prepare initial disclosure for Mei Guo adversary proceeding and trial (.6); correspond with W. Farmer and N. Bassett about same (.2); call with D. Barron about same (.2)	1.00	1,015.00	1,015.00
07/24/2023		Correspond with W. Farmer, P. Linsey (NPM) and E. Sutton on Mei Guo scheduling order and deadlines	0.30	815.00	244.50
07/24/2023		Review pre-trial order on deadlines and schedules	0.20	815.00	163.00
07/24/2023	NAB	Review Defendants' initial disclosures (.2); review and revise Plaintiff's initial disclosures (.4); correspond with E. Sutton regarding same (.1)	0.70	1,625.00	1,137.50
07/24/2023	WCF	Review and revise initial disclosures	0.20	1,235.00	247.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00016
Invoice No. 2369642

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	ECS1	Prepare discovery requests for Mei Guo adversary proceeding and trial	0.10	1,015.00	101.50
07/27/2023	ECS1	Prepare RFPs, RFAs, and interrogatories for Mei Guo adversary proceeding and trial (3.1); correspond with W. Farmer about same (.1)	3.20	1,015.00	3,248.00
07/28/2023	DEB4	Correspond with N. Bassett and A. Luft regarding order to show cause for Mei Guo	0.30	1,320.00	396.00
07/28/2023	DEB4	Correspond with D. Mohamed and J. Kuo regarding order to show cause for Mei Guo	0.10	1,320.00	132.00
07/29/2023	DEB4	Correspond with W. Farmer regarding discovery requests	0.10	1,320.00	132.00
07/29/2023	NAB	Correspond with W. Farmer regarding draft discovery requests	0.20	1,625.00	325.00
07/30/2023	DEB4	Correspond with W. Farmer regarding discovery requests	0.10	1,320.00	132.00
07/31/2023	DEB4	Correspond with W. Farmer regarding requests for production	0.10	1,320.00	132.00
07/31/2023	DEB4	Analyze requests for production to Mei Guo (1.2); correspond with A. Luft regarding same (1.0)	2.20	1,320.00	2,904.00
07/31/2023	ECS1	Prepare requests for production, requests for admission, and interrogatories for Mei Guo adversary proceeding and trial (2.0); correspond with W. Farmer about same (.2)	2.20	1,015.00	2,233.00
07/31/2023	AEL2	Edit RFP's to M. Guo	1.40	1,625.00	2,275.00
07/31/2023	AEL2	Edit RFA's to M. Guo	1.30	1,625.00	2,112.50
07/31/2023	AEL2	Correspond with D. Barron re: M. Guo discovery requests	0.60	1,625.00	975.00
07/31/2023	AEL2	Draft interrogatories to M. Guo	1.40	1,625.00	2,275.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00016
Invoice No. 2369642

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/31/2023	WCF	Review and revise requests for production regarding Mei Guo adversary complaint and Bombardier jet (1.8); correspond with D. Barron and A. Luft regarding same (.3); revise interrogatories and requests for admission regarding same (3.4); further revise RFPs, interrogatories, and RFAs for service on Greenwich Land defendants (.6); correspond with N. Bassett regarding same (.2)	6.30	1,235.00	7,780.50
Subtotal: B191 General Litigation			33.70		42,793.50
Total			33.70		42,793.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	3.20	1,625.00	5,200.00
AEI2	Luft, Avi E.	Of Counsel	7.80	1,625.00	12,675.00
DEB4	Douglass E. Barron	Associate	4.60	1,320.00	6,072.00
WCF	Will C. Farmer	Associate	6.50	1,235.00	8,027.50
ECS1	Ezra C. Sutton	Associate	9.30	1,015.00	9,439.50
		Associate	0.50	815.00	407.50
JK21	Jocelyn Kuo	Paralegal	1.60	540.00	864.00
DM26	David Mohamed	Paralegal	0.20	540.00	108.00

Current Fees and Costs	\$42,793.50
Total Balance Due - Due Upon Receipt	\$42,793.50



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200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369643

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

HK USA Adversary Proceeding

PH LLP Client/Matter # 50687-00017
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$76,657.00
Costs incurred and advanced	398.88
Current Fees and Costs Due	\$77,055.88
Total Balance Due - Due Upon Receipt	\$77,055.88

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HK USA Adversary Proceeding

PH LLP Client/Matter # 50687-00017
Luc A. Despins

Legal fees for professional services for the period ending July 31, 2023	\$76,657.00
Costs incurred and advanced	398.88
Current Fees and Costs Due	\$77,055.88
Total Balance Due - Due Upon Receipt	\$77,055.88

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 Invoice Number: 2369643

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

HK USA Adversary Proceeding **\$76,657.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/02/2023	SK35	Analyze case law and statutory authority regarding standard of review for district court reviewing bankruptcy court order denying a stay pending appeal	2.00	855.00	1,710.00
07/05/2023	SK35	Continue to analyze case law regarding standard of review applied to district court reviewing bankruptcy court order denying a stay pending appeal	1.80	855.00	1,539.00
07/05/2023	WCF	Draft response to emergency motion for stay pending appeal of summary judgment order on second counterclaim against HK Parties (3.7); analyze authorities regarding irreparable harm analysis for draft response (.9)	4.60	1,235.00	5,681.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00017
Invoice No. 2369643

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/06/2023	NAB	Analyze case law relating to opposition to HK USA alter ego motion for stay pending appeal (1.5); correspond with W. Farmer regarding same (.7); calls with W. Farmer regarding same (.4); review and revise draft opposition to HK USA alter ego motion for stay pending appeal (2.6); review merits briefing, summary judgment decision, and additional documents related to same (.8); correspond with L. Despins regarding same (.2); call with P. Linsey (NPM) regarding same (.2); draft parts of opposition brief (2.7); email with J. Moriarty (Zeisler) regarding Mei Guo preliminary injunction issues (.2)	9.30	1,625.00	15,112.50
07/06/2023	SK35	Continue analyzing caselaw regarding the standard of review applied to a district court reviewing a bankruptcy court order denying a stay pending appeal	5.30	855.00	4,531.50
07/06/2023	WCF	Analyze case law and statutory authority regarding harm pending appeal (3.8); draft opposition to motion for stay pending appeal (6.1); calls with N. Bassett regarding same (.4); further analyze authorities regarding irreparable harm and standard of review regarding stay pending appeal (1.5); continue to draft response to motion for stay pending appeal (1.9)	13.70	1,235.00	16,919.50
07/07/2023	LAD4	Review/edit stay pending appeal claim 2 (1.40); various emails to N. Bassett, A. Luft re: same (.50)	1.90	1,860.00	3,534.00
07/07/2023	NAB	Revise and draft parts of opposition to motion to stay HK USA alter ego decision pending appeal (2.2); analyze case law relating to same (.9); correspond with L. Despins regarding same (.4); calls with W. Farmer regarding same (.4); correspond with W. Farmer regarding same (.8); further supplement opposition to motion to stay HK USA alter ego decision pending appeal (1.3)	6.00	1,625.00	9,750.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	WCF	Further draft response to motion for stay pending appeal (3.6); calls with N. Bassett, P. Linsey (Neubert) regarding same (.4); revise response to motion for stay pending appeal (1.4)	5.40	1,235.00	6,669.00
07/11/2023	ECS1	Correspond with N. Bassett regarding writ of mandamus action in the Connecticut district court	0.10	1,015.00	101.50
07/16/2023	NAB	Review reply in support of stay pending appeal (.3); correspond with W. Farmer regarding same (.2)	0.50	1,625.00	812.50
07/16/2023	SM29	Review defendants motion for stay pending appeal (.3); review email from W. Farmer and N. Bassett re same (.1)	0.40	1,320.00	528.00
07/17/2023	NAB	Call with A. Romney (Zeisler) regarding adjournment of pretrial conference (.1); review draft motion to adjourn (.1)	0.20	1,625.00	325.00
07/18/2023	DEB4	Correspond with L. Despins regarding HK USA pleading	0.10	1,320.00	132.00
07/18/2023	NAB	Correspond with L. Despins regarding pretrial conference and related issues and strategy	0.20	1,625.00	325.00
07/23/2023	NAB	Review appellate brief in discovery sanctions appeal	0.50	1,625.00	812.50
07/24/2023	NAB	Correspond and call with P. Linsey (Neubert) regarding summary judgment appeal extension request and related issues (.2); email with L. Despins regarding same (.2)	0.40	1,625.00	650.00
07/25/2023	NAB	Correspond with P. Linsey regarding HK USA appellate issues and requested briefing extension (.2); review draft response to requested briefing extension (.2)	0.40	1,625.00	650.00
07/26/2023	LAD4	Analyze rule 54b issue raised by Judge Manning (.70); t/c N. Bassett re: same (.20)	0.90	1,860.00	1,674.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	NAB	Analyze issues related to appellate status and preliminary injunction (.3); correspond with L. Despins regarding same (.2); analyze authority on Rule 54 final judgment issue (.6); draft proposed Rule 54(b) response brief (1.4); correspond with L. Despins and P. Linsey (NPM) regarding same (.3)	2.80	1,625.00	4,550.00
07/28/2023	NAB	Review and revise draft response to rule 54(b) final judgment issue (.3); correspond with P. Linsey (NPM) regarding same (.1)	0.40	1,625.00	650.00
Subtotal: B191 General Litigation			56.90		76,657.00
Total			56.90		76,657.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	2.80	1,860.00	5,208.00
NAB	Nicholas A. Bassett	Partner	20.70	1,625.00	33,637.50
SM29	Shlomo Maza	Associate	0.40	1,320.00	528.00
DEB4	Douglass E. Barron	Associate	0.10	1,320.00	132.00
WCF	Will C. Farmer	Associate	23.70	1,235.00	29,269.50
ECS1	Ezra C. Sutton	Associate	0.10	1,015.00	101.50
SK35	Sarah Kim	Associate	9.10	855.00	7,780.50

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	Westlaw			397.80
07/07/2023	Computer Search (Other)			1.08
Total Costs incurred and advanced				\$398.88

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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Current Fees and Costs	\$77,055.88
Total Balance Due - Due Upon Receipt	<u><u>\$77,055.88</u></u>



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369644

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Bravo Luck Adversary Proceeding

PH LLP Client/Matter # 50687-00018
Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$68,595.50

Current Fees and Costs Due

\$68,595.50

Total Balance Due - Due Upon Receipt

\$68,595.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369644

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Bravo Luck Adversary Proceeding

PH LLP Client/Matter # 50687-00018
Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$68,595.50

Current Fees and Costs Due

\$68,595.50

Total Balance Due - Due Upon Receipt

\$68,595.50

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369644

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Bravo Luck Adversary Proceeding **\$68,595.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/03/2023	NAB	Review revised Bravo Luck settlement agreement (.3); correspond with L. Despins and A. Luft regarding same (.1)	0.40	1,625.00	650.00
07/05/2023	ECS1	Correspond with A. Luft and W. Farmer regarding settlement agreement with Bravo Luck and the Debtor's son regarding the Sherry Netherlands apartment	0.10	1,015.00	101.50
07/05/2023	LAD4	T/c N. Bassett re: scope of releases (.20); t/c S. Sarnoff (OMM), I. Goldman (Pullman) and N. Bassett re: scope of releases (.50); review same (1.10)	1.80	1,860.00	3,348.00
07/05/2023	AEL2	Correspond with N. Bassett and L. Despins re: Bravo Luck agreement proposal and strategy	0.40	1,625.00	650.00
07/05/2023	AEL2	Analyze revised settlement agreement with Bravo Luck	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/05/2023	NAB	Call with L. Despins regarding Bravo Luck settlement agreement (.2); call with L. Despins, I. Goldman (Committee), S. Sarnoff (OMM) and P. Friedman (OMM) regarding same (.5); correspond with L. Despins regarding same (.2); call with F. Lawall (Troutman) regarding same (.1); further correspond with L. Despins, I. Goldman, and S. Sarnoff regarding same (.2); further call with S. Sarnoff regarding same and additional issues (.1)	1.30	1,625.00	2,112.50
07/06/2023	KC27	Call with A. Luft and S. Maza regarding RICO claims and settlement of the adversary proceeding	0.80	915.00	732.00
07/06/2023	AEL2	Participate in strategy calls with N. Bassett re: Bravo Luck release	0.60	1,625.00	975.00
07/06/2023	AEL2	Analyze provisions re: Bravo Luck settlement proposal	0.40	1,625.00	650.00
07/06/2023	AEL2	Participate in settlement call with F. Lawall (Troutman) and N. Bassett	0.40	1,625.00	650.00
07/06/2023	AEL2	Analyze Bravo Luck documents and claims (1.7); analyze case law and statutory authority regarding RICO claims (6.1)	7.80	1,625.00	12,675.00
07/06/2023	AEL2	Call with S. Maza and K. Catalano re: civil RICO analysis of potential claims being investigated	0.80	1,625.00	1,300.00
07/06/2023	NAB	Analyze Bravo Luck settlement issues (.5); call with A. Luft and F. Lawall (Troutman) regarding same (.4); follow-up calls with A. Luft regarding same and related issues (.6); review authority regarding settlement issue (.3); correspond with L. Despins regarding same (.2)	2.00	1,625.00	3,250.00
07/06/2023	SM29	Call with A. Luft and K. Catalano re RICO claims and Bravo Luck settlement proposal (.8); analyze authority re same (.7); email A. Luft re same (.2)	1.70	1,320.00	2,244.00
07/07/2023	AEL2	Call with A. Weitzman re: RICO claim analysis	0.70	1,625.00	1,137.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2023	AEL2	Correspond with L. Despins re: potential RICO claim and impact on settlement	0.30	1,625.00	487.50
07/07/2023	NAB	Additional analysis of Bravo Luck litigation and settlement issues (.5); correspond with L. Despins and A. Luft regarding same (.3); correspond with F. Lawall (Troutman) regarding discovery and upcoming deadlines (.1); review draft extension motions (.1)	1.00	1,625.00	1,625.00
07/08/2023	NAB	Analyze potential Bravo Luck settlement (.2); correspond with L. Despins regarding potential Bravo Luck settlement (.2)	0.40	1,625.00	650.00
07/09/2023	LAD4	T/c N. Bassett re: releases (.20); t/c I. Goldman (Pullman), S. Sarnoff (OMM) and N. Bassett re: same (.80)	1.00	1,860.00	1,860.00
07/09/2023	NAB	Call with L. Despins regarding Bravo Luck settlement analysis (.2); prepare notes for call with I. Goldman (Committee counsel), S. Sarnoff (OMM) and P. Friedman (OMM) regarding same (.1); call with L. Despins, I. Goldman (Committee counsel), S. Sarnoff (OMM) and P. Friedman (OMM) regarding same (.8); follow-up correspondence with L. Despins, I. Goldman (Pullman), S. Sarnoff (OMM) and P. Friedman (OMM) regarding same (.1)	1.20	1,625.00	1,950.00
07/10/2023	ECS1	Prepare chronology of Genever entities and Debtor's bankruptcy filings, consolidations, and adversary complaints against Bravo Luck (.3); prepare summary of related claim amounts (.1); correspond with S. Maza about same (.1)	0.50	1,015.00	507.50
07/10/2023	NAB	Correspond with L. Despins regarding Bravo Luck settlement agreement (.5); revise draft of same (.4); correspond with S. Sarnoff (OMM) regarding same (.1)	1.00	1,625.00	1,625.00
07/10/2023	WCF	Review and comment on responses and objections regarding Bravo Luck interrogatories	0.30	1,235.00	370.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2023	DEB4	Correspond with S. Maza regarding Debtor/Bravo Luck org charts	0.10	1,320.00	132.00
07/11/2023	WCF	Review and comment on responses and objections regarding Bravo Luck interrogatories, requests for production, and requests for admissions	1.30	1,235.00	1,605.50
07/12/2023	AEL2	Correspond with N. Bassett re: release language in potential settlement agreement	0.20	1,625.00	325.00
07/12/2023	AEL2	Discussion with N. Bassett and F. Lawall (Troutman) re: latest draft settlement proposal	0.30	1,625.00	487.50
07/12/2023	AEL2	Follow up correspondence with N. Bassett re: call with F. Lawall and mutuality of release	0.20	1,625.00	325.00
07/12/2023	AEL2	Review correspondence with F. Lawall (Troutman) re: potential agreement to resolve issues	0.10	1,625.00	162.50
07/12/2023	AEL2	Analyze revised draft of proposed settlement agreement	0.30	1,625.00	487.50
07/12/2023	AEL2	Review edits to settlement proposal	0.10	1,625.00	162.50
07/12/2023	NAB	Review revised draft of Bravo Luck settlement agreement (.2); correspond with L. Despins and A. Luft regarding same (.1)	0.30	1,625.00	487.50
07/12/2023	NAB	Call with A. Luft and F. Lawall (Troutman) regarding Bravo Luck settlement discussions (.3); follow-up email with L. Despins regarding same (.3)	0.60	1,625.00	975.00
07/13/2023	LAD4	Review/edit Bravo Luck settlement (1.20); emails to/from N. Bassett & A. Luft re: same (.40)	1.60	1,860.00	2,976.00
07/13/2023	AEL2	Correspond with N. Bassett re: clause in draft settlement agreement	0.20	1,625.00	325.00
07/13/2023	AEL2	Correspond with N. Bassett and L. Despins re: edits to draft agreement with Bravo Luck	0.20	1,625.00	325.00
07/13/2023	AEL2	Revise Bravo Luck draft settlement agreement	0.30	1,625.00	487.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/13/2023	NAB	Correspond with J. Cline (Troutman) regarding Bravo Luck settlement (.1); review current draft settlement agreement (.3); correspond with L. Despins and A. Luft regarding same (.2)	0.60	1,625.00	975.00
07/17/2023	AEL2	Meet and confer with F. Lawall (Troutman) and N. Bassett re: potential settlement agreement terms	0.40	1,625.00	650.00
07/17/2023	NAB	Correspond with A. Luft regarding Bravo Luck litigation and settlement issues (.2); call with F. Lawall (Troutman) and A. Luft regarding settlement discussions (.4); correspond with L. Despins regarding same (.2); review complaint and supporting documents in connection with same (.2); analyze issues related to potential future claims (.2)	1.20	1,625.00	1,950.00
07/18/2023	NAB	Revise Bravo Luck settlement agreement (.3); correspond with L. Despins and F. Lawall (Troutman) regarding same (.2)	0.50	1,625.00	812.50
07/19/2023	AEL2	Review correspondence with F. Lawall re: settlement proposal	0.30	1,625.00	487.50
07/19/2023	NAB	Correspond with F. Lawall (Troutman) and negotiate settlement agreement (.4); correspond with L. Despins regarding same (.2)	0.60	1,625.00	975.00
07/20/2023	AB21	Call with E. Sutton regarding rule 9019 settlement motion (0.1); correspond with N. Bassett regarding same (0.1)	0.20	1,625.00	325.00
07/20/2023	ECS1	Prepare rule 9019 motion to compromise in connection with Sherry Netherland apartment and Bravo Luck adversary proceeding (2.0); call with A. Bongartz about same (.1)	2.10	1,015.00	2,131.50
07/20/2023	NAB	Correspond with opposing counsel regarding settlement issues (.2); correspond with A. Bongartz regarding settlement motion (.1)	0.30	1,625.00	487.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/21/2023	AB21	Revise rule 9019 settlement motion (0.3); correspond with N. Bassett and A. Luft regarding same (0.1)	0.40	1,625.00	650.00
07/21/2023	ECS1	Prepare motion to limit service of rule 9019 motion to compromise in connection with Sherry Netherland apartment and Bravo Luck adversary proceeding	1.00	1,015.00	1,015.00
07/23/2023	AB21	Review draft motion to limit service of rule 9019 motion (0.2); correspond with E. Sutton regarding same (0.1)	0.30	1,625.00	487.50
07/23/2023	ECS1	Prepare rule 9019 motion to compromise and connected motion to limit service in connection with Sherry Netherland apartment and Bravo Luck adversary proceeding	0.50	1,015.00	507.50
07/23/2023	NAB	Review and revise draft settlement motion and proposed order (.6); correspond with E. Sutton regarding same (.2)	0.80	1,625.00	1,300.00
07/24/2023	AB21	Call with E. Sutton regarding Bravo Luck rule 9019 settlement motion (0.1); correspond with N. Bassett regarding same (0.1); review motion to limit service of rule 9019 motion (0.1)	0.30	1,625.00	487.50
07/24/2023	ECS1	Prepare rule 9019 motion to compromise and connected motion to limit service in connection with Sherry Netherland apartment and Bravo Luck adversary proceeding (.5); call with A. Bongartz regarding same (.1); correspond with N. Bassett and A. Bongartz regarding same (.1)	0.70	1,015.00	710.50
07/25/2023	AB21	Correspond with E. Sutton regarding rule 9019 motion	0.10	1,625.00	162.50
07/25/2023	ECS1	Prepare rule 9019 motion to compromise and connected motion to limit service in connection with Sherry Netherland apartment and Bravo Luck adversary proceeding (.9); correspond with N. Bassett, A. Bongartz, and L. Despins regarding same (.2)	1.10	1,015.00	1,116.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2023	NAB	Review draft settlement motion (.4); email with L. Despins and E. Sutton regarding same (.2); email with F. Lawall (Troutman) regarding same (.1)	0.70	1,625.00	1,137.50
07/26/2023	AB21	Correspond with N. Bassett regarding rule 9019 settlement order	0.10	1,625.00	162.50
07/26/2023	NAB	Emails with F. Lawall (Troutman) regarding settlement agreement (.2); review same (.2)	0.40	1,625.00	650.00
07/27/2023	NAB	Email with F. Lawall (Bravo Luck counsel) regarding settlement issues	0.30	1,625.00	487.50
07/31/2023	NAB	Call with F. Lawall (Troutman) regarding issues with settlement agreement (.2); correspond with F. Lawall regarding same (.2); review and revise settlement agreement (.4); email with L. Despins regarding same (.1)	0.90	1,625.00	1,462.50
Subtotal: B191 General Litigation			44.90		68,595.50
Total			44.90		68,595.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	4.40	1,860.00	8,184.00
NAB	Nicholas A. Bassett	Partner	14.50	1,625.00	23,562.50
AB21	Alex Bongartz	Of Counsel	1.40	1,625.00	2,275.00
AEL2	Luft, Avi E.	Of Counsel	14.40	1,625.00	23,400.00
SM29	Shlomo Maza	Associate	1.70	1,320.00	2,244.00
DEB4	Douglass E. Barron	Associate	0.10	1,320.00	132.00
WCF	Will C. Farmer	Associate	1.60	1,235.00	1,976.00
ECS1	Ezra C. Sutton	Associate	6.00	1,015.00	6,090.00
KC27	Kristin Catalano	Associate	0.80	915.00	732.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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Current Fees and Costs	\$68,595.50
Total Balance Due - Due Upon Receipt	<u><u>\$68,595.50</u></u>



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369645

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

SN Apartment Adversary Proceeding

PH LLP Client/Matter # 50687-00019

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$1,300.00

Current Fees and Costs Due

\$1,300.00

Total Balance Due - Due Upon Receipt

\$1,300.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369645

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

SN Apartment Adversary Proceeding

PH LLP Client/Matter # 50687-00019

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$1,300.00

Current Fees and Costs Due

\$1,300.00

Total Balance Due - Due Upon Receipt

\$1,300.00

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Luc Despins as Chapter 11 Trustee in the case of Ho
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 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369645

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

SN Apartment Adversary Proceeding **\$1,300.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/08/2023	NAB	Email with J. Moriarty (Zeisler) and P. Linsey (NPM) regarding Sherry Netherland adversary proceeding pretrial conference	0.10	1,625.00	162.50
07/09/2023	AB21	Correspond with L. Despins regarding arguments raised in SN apartment adversary proceedings and timeline of same	0.30	1,625.00	487.50
07/14/2023	NAB	Emails with J. Cline (Troutman) regarding settlement discussions (.2); review draft agreement (.2)	0.40	1,625.00	650.00
Subtotal: B191 General Litigation			0.80		1,300.00
Total			0.80		1,300.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	0.50	1,625.00	812.50
AB21	Alex Bongartz	Of Counsel	0.30	1,625.00	487.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00019
Invoice No. 2369645

Page 2

Current Fees and Costs	\$1,300.00
Total Balance Due - Due Upon Receipt	<u><u>\$1,300.00</u></u>



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369646

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Greenwich Land Adversary Proceeding

PH LLP Client/Matter # 50687-00020

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$323,941.00

Costs incurred and advanced

1,210.44

Current Fees and Costs Due

\$325,151.44

Total Balance Due - Due Upon Receipt

\$325,151.44

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 7, 2023

Please Refer to
Invoice Number: 2369646

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Greenwich Land Adversary Proceeding

PH LLP Client/Matter # 50687-00020

Luc A. Despins

Legal fees for professional services
for the period ending July 31, 2023

\$323,941.00

Costs incurred and advanced

1,210.44

Current Fees and Costs Due

\$325,151.44

Total Balance Due - Due Upon Receipt

\$325,151.44

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Luc Despins as Chapter 11 Trustee in the case of Ho
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 200 Park Avenue
 New York, NY 10166

September 7, 2023

Please Refer to
 Invoice Number: 2369646

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending July 31, 2023

Greenwich Land Adversary Proceeding

\$323,941.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
07/05/2023		Revise witness declaration to incorporate comments from D. Barron	0.40	815.00	326.00
07/06/2023	AEL2	Correspond with W. Farmer re: discovery response and review of documents	0.20	1,625.00	325.00
07/07/2023	ECS1	Prepare summary of Greenwich Land's motion for withdrawal of reference in the Greenwich Land adversary proceeding (.9); correspond with N. Bassett, A. Luft, S. Maza regarding same (.1)	1.00	1,015.00	1,015.00
07/08/2023	ECS1	Correspond with S. Maza and N. Bassett regarding deadline to respond to motion to withdraw reference	0.20	1,015.00	203.00
07/08/2023	NAB	Review Greenwich Land motion for withdrawal of reference (.3); analyze issues related to same (.4); correspond with E. Sutton regarding same (.1)	0.80	1,625.00	1,300.00
07/09/2023	NAB	Correspond with S. Maza regarding Greenwich Land motion to withdraw the reference	0.20	1,625.00	325.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00020
Invoice No. 2369646

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/09/2023	SM29	Analyze case law in connection with Greenwich Land's motion to withdraw reference	1.60	1,320.00	2,112.00
07/10/2023	AG30	Prepare responses and objections to discovery requests in Greenwich Land adversary proceeding	3.30	915.00	3,019.50
07/10/2023	JK21	Research orders to withdraw the reference	0.60	540.00	324.00
07/10/2023	AEL2	Consider and prepare notes re upcoming discovery plan	0.30	1,625.00	487.50
07/10/2023	SM29	Analyze caselaw re application of section 157 (4.1); review defendants' motion to withdraw the reference (.5); correspond with D. Barron re same (.2)	4.80	1,320.00	6,336.00
07/11/2023	DEB4	Review district court docket re: withdrawal of reference	0.10	1,320.00	132.00
07/11/2023	LAD4	T/c S. Maza re: withdrawal of the reference (.30); review/comment on same (.90)	1.20	1,860.00	2,232.00
07/11/2023	SM29	Call with L. Despins regarding objection to motion to withdraw reference (.3); correspond with K. Catalano re same (.4)	0.70	1,320.00	924.00
07/11/2023	WCF	Analyze authorities regarding work product doctrine in rule 2004 and adversary proceeding discovery context (2.5); review, revise responses and objections to Greenwich Land defendants' interrogatories (2.1)	4.60	1,235.00	5,681.00
07/12/2023	DEB4	Conference with A. Luft and W. Farmer regarding Greenwich Land interrogatories	1.00	1,320.00	1,320.00
07/12/2023	DEB4	Analyze documents related to Greenwich Land interrogatories	0.50	1,320.00	660.00
07/12/2023	DEB4	Correspond with regarding witness declaration	0.30	1,320.00	396.00
07/12/2023	ECS1	Correspond with A. Luft about Greenwich Land adversary depositions and hearing dates	0.30	1,015.00	304.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2369646

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	ECS1	Prepare responses and objections to requests for admission in the Greenwich Land adversary proceeding (2.8); correspond with W. Farmer, A. Luft, and about same (.4)	3.20	1,015.00	3,248.00
07/12/2023	JK21	Correspond with S. Maza regarding orders denying withdrawal of reference	0.40	540.00	216.00
07/12/2023	AEL2	Review and revise draft responses to Greenwich Land interrogatories	2.40	1,625.00	3,900.00
07/12/2023	AEL2	Review and revise draft response to requests for admission	1.10	1,625.00	1,787.50
07/12/2023	AEL2	Analyze draft declaration	1.20	1,625.00	1,950.00
07/12/2023	AEL2	Meet with W. Farmer and D. Barron re: comments on draft interrogatory responses	1.00	1,625.00	1,625.00
07/12/2023	AEL2	Review Greenwich Land pleadings for purposes of editing discovery responses	0.90	1,625.00	1,462.50
07/12/2023	AEL2	Correspond with W. Farmer and D. Barron re: Greenwich Land complaint as it relates to interrogatory responses	0.30	1,625.00	487.50
07/12/2023	AEL2	Meet with N. Bassett and W. Farmer re: plan for Greenwich Land discovery responses and depositions	0.60	1,625.00	975.00
07/12/2023	AEL2	Call with N. Bassett re: interrogatory strategy	0.10	1,625.00	162.50
07/12/2023		Prepare draft responses and objections to Greenwich Land's requests for production	4.00	815.00	3,260.00
07/12/2023		Review Greenwich Land's production of the consent of sole member without a meeting signed by Hing Chi Ngok	0.20	815.00	163.00
07/12/2023		Conference with J. Hibbard on the responses and objections to Greenwich Land's requests for production	0.30	815.00	244.50
07/12/2023		Correspond with E. Sutton on the Greenwich Land requests for admission and requests for production	0.20	815.00	163.00
07/12/2023	NAB	Call with A. Luft and W. Farmer regarding Greenwich Land discovery issues	0.60	1,625.00	975.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2369646

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2023	NAB	Call with A. Luft regarding Greenwich Land discovery strategy	0.10	1,625.00	162.50
07/12/2023	SM29	Correspond with J. Kuo and K. Catalano re objection to withdrawal of the reference	0.20	1,320.00	264.00
07/12/2023	WCF	Conference with A. Luft and N. Bassett regarding responses and objections to Greenwich Land discovery (.6); review, revise responses and objections to Greenwich Land interrogatories (1.3); meeting with D. Barron and A. Luft regarding responses to interrogatories (1.0)	2.90	1,235.00	3,581.50
07/13/2023	DEB4	Conference with A. Luft and W. Farmer regarding requests for admissions (.3); conference with A. Luft and regarding declaration (.5); conference with A. Luft regarding Greenwich Land interrogatories (.6); revise same (2.6); correspond with W. Farmer regarding same (.3)	4.30	1,320.00	5,676.00
07/13/2023	ECS1	Prepare responses and objections to discovery requests in the Greenwich Land adversary proceeding (.2); review Greenwich Land's responses and objections to Trustee's discovery requests (.5); correspond with W. Farmer, A. Luft, and about same (.3); call with N. Bassett, A. Luft, W. Farmer, and about same (.3)	1.30	1,015.00	1,319.50
07/13/2023	AEL2	Call with N. Bassett, W. Farmer, and E. Sutton re: plan for discovery request responses	0.30	1,625.00	487.50
07/13/2023	AEL2	Meet with W. Farmer and D. Barron re: comments on requests for admission	0.30	1,625.00	487.50
07/13/2023	AEL2	Revise draft responses to requests for admission	2.20	1,625.00	3,575.00
07/13/2023	AEL2	Meet with D. Barron re: comments on interrogatories	0.60	1,625.00	975.00
07/13/2023	AEL2	Revise interrogatory and RFA responses	4.70	1,625.00	7,637.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2369646

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/13/2023	AEL2	Meeting with [redacted] and D. Barron re: evidence	0.50	1,625.00	812.50
07/13/2023	AEL2	Call with W. Farmer re: general objections to requests for admission	0.30	1,625.00	487.50
07/13/2023		Revise draft witness declaration	0.60	815.00	489.00
07/13/2023		Conference with A. Luft and D. Barron on potential witness and draft declaration	0.50	815.00	407.50
07/13/2023		Conference with N. Bassett, A. Luft, W. Farmer and E. Sutton on the responses and objections to Greenwich Land's requests for admission, interrogatories and requests for production	0.30	815.00	244.50
07/13/2023		Prepare draft response and objections to Greenwich Land's requests for admission	2.60	815.00	2,119.00
07/13/2023	NAB	Review draft responses to Greenwich Land discovery requests (.5); correspond with A. Luft regarding same (.3); call with W. Farmer, [redacted], E. Sutton, and A. Luft regarding same (.3)	1.10	1,625.00	1,787.50
07/13/2023	WCF	Draft responses and objections to Greenwich Land interrogatories (2.8); analyze Greenwich Land complaint and evidence in support regarding same (1.9); draft responses and objections to Greenwich Land requests for admission (3.8); review, revise Greenwich Land responses and objections to requests for production of documents (3.8); conference with D. Barron and A. Luft regarding requests for admissions (.3); further conference with A. Luft regarding responses to interrogatories (.3); meeting with N. Bassett, A. Luft, E. Sutton, and [redacted] regarding responses and objections to interrogatories (.3)	13.20	1,235.00	16,302.00
07/14/2023	DEB4	Correspond with N. Bassett regarding Greenwich Land interrogations	0.10	1,320.00	132.00
07/14/2023	DEB4	Correspond with N. Bassett regarding Ngok deposition	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2369646

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2023	DEB4	Revise Greenwich Land interrogatory responses	0.80	1,320.00	1,056.00
07/14/2023	ECS1	Prepare responses and objections to discovery requests in the Greenwich Land adversary proceeding	0.10	1,015.00	101.50
07/14/2023	KC27	Analyze case law regarding withdrawal of reference	1.10	915.00	1,006.50
07/14/2023	AEL2	Revise responses to Greenwich Land's requests for admission, requests for production, and interrogatories	7.40	1,625.00	12,025.00
07/14/2023	AEL2	Correspond with D. Barron re: edits to responses to interrogatories	0.50	1,625.00	812.50
07/14/2023	AEL2	Correspond with N. Bassett re: responses to Greenwich Land discovery	0.60	1,625.00	975.00
07/14/2023		Prepare and serve responses to Greenwich Land's request for admission, request for production, and interrogatories	1.30	815.00	1,059.50
07/14/2023		Review information and document on witness's involvements in Kwok's activities	0.50	815.00	407.50
07/14/2023	NAB	Review and revise responses to requests for admissions and interrogatories (1.4); correspond with A. Luft regarding same (.4); call with W. Farmer regarding same (.2); review and revise responses to document requests (2.6); further revise interrogatory responses (.5); correspond with W. Farmer and D. Barron regarding same (.2)	5.30	1,625.00	8,612.50
07/14/2023	SM29	Correspond with K. Catalano re Greenwich Land motion for withdrawal of reference	0.20	1,320.00	264.00
07/14/2023	WCF	Review, revise responses and objections to Greenwich Land interrogatories and requests for admission (1.4); revise, finalize responses and objections to Greenwich Land requests for production (2.0); call with N. Bassett regarding same (.2)	3.60	1,235.00	4,446.00
07/16/2023		Prepare due diligence summary on the potential witness	2.20	815.00	1,793.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
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Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/16/2023		Review pretrial order for dates and deadlines	0.20	815.00	163.00
07/17/2023	DEB4	Correspond with L. Despins regarding witness	0.30	1,320.00	396.00
07/17/2023	DEB4	Correspond with regarding witness documents	0.10	1,320.00	132.00
07/17/2023	DEB4	Conference with E. Sutton, N. Bassett, W. Farmer and A. Luft regarding Greenwich Land discovery	1.00	1,320.00	1,320.00
07/17/2023	ECS1	Prepare list of parties to be deposed in connection with Greenwich Land adversary proceeding fact discovery	0.60	1,015.00	609.00
07/17/2023	ECS1	Call with N. Bassett, A. Luft, D. Barron, and W. Farmer regarding discovery requests, deposition timeline, and discovery responses in Greenwich Land adversary proceeding	1.00	1,015.00	1,015.00
07/17/2023	KC27	Analyze case law regarding alter ego claim as Stern claim (2.9); summarize findings on same (.5); analyze case law regarding right to a jury trial (1.4); summarize findings on same (.3); correspond with S. Maza regarding same (.1)	5.20	915.00	4,758.00
07/17/2023	AEL2	Call with N. Bassett (portion), W. Farmer, D. Barron, E. Sutton re: analysis of Greenwich Land discovery responses and depositions to be noticed	1.00	1,625.00	1,625.00
07/17/2023		Correspond with UnitedLex on Aaron Mitchell's document production	0.30	815.00	244.50
07/17/2023	NAB	Join portion of call with D. Barron, A. Luft, W. Farmer, E. Sutton regarding discovery and litigation strategy (.3); follow-up correspondence with A. Luft regarding same (.1)	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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Page 8

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2023	WCF	Call with A. Luft, N. Bassett (portion), E. Sutton, D. Barron regarding responses to Greenwich Land discovery and next steps (1.0); correspond with E. Levine and M. Coleman regarding UnitedLex Greenwich Land document review (.2); analyze Greenwich Land responses and objections to interrogatories and requests for admission in preparing for meet and confer (.5)	1.70	1,235.00	2,099.50
07/18/2023	ECS1	Review pertinent custodians in connection with production of documents in Greenwich Land adversary proceeding (.5); correspond with W. Farmer about same (.1)	0.60	1,015.00	609.00
07/18/2023	ECS1	Prepare list of parties to be deposed in connection with Greenwich Land adversary proceeding fact discovery (1.1); correspond with W. Farmer about same (.1)	1.20	1,015.00	1,218.00
07/18/2023	ECS1	Call with W. Farmer, E. Levine (UnitedLex) and W. Clark (UnitedLex) regarding Kwok document review related to G Club and Greenwich Land	0.40	1,015.00	406.00
07/18/2023	KC27	Analyze precedent for withdrawal of reference objections (1.8); call with S. Maza regarding same (.2)	2.00	915.00	1,830.00
07/18/2023	SM29	Review email from K. Catalano re withdrawal of reference case findings (.2); call with K. Catalano re same (.2); analyze withdrawal of reference cases (.8)	1.20	1,320.00	1,584.00
07/18/2023	WCF	Meeting with E. Levine, W. Clark, M. Coleman, E. Sutton regarding Greenwich Land document review protocol (.4); correspond with N. Bassett and A. Luft regarding same (.3); analyze Greenwich Land complaint and discovery documents in planning for depositions and document review (1.6)	2.30	1,235.00	2,840.50
07/19/2023	DEB4	Correspond with W. Farmer regarding Greenwich Land expert disclosure	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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50687-00020
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Page 9

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	ECS1	Prepare subpoenas and deposition notices in connection with Greenwich Land adversary proceeding fact discovery (2.1); correspond with W. Farmer and about same (.4)	2.50	1,015.00	2,537.50
07/19/2023	JK21	Research regarding withdrawal of reference and related precedent	1.10	540.00	594.00
07/19/2023	KC27	Analyze case law regarding Stern claims (2.8); prepare objection to withdrawal of reference (2.2)	5.00	915.00	4,575.00
07/19/2023		Prepare notices of depositions and subpoenas on potential deponents	2.90	815.00	2,363.50
07/19/2023		Prepare document review protocol for the Greenwich Land documents	3.50	815.00	2,852.50
07/19/2023	NAB	Correspond with W. Farmer, A. Luft regarding Greenwich Land discovery issues	0.50	1,625.00	812.50
07/19/2023	WCF	Correspond with A. Luft, E. Sutton, , N. Bassett regarding revised discovery to be propounded on Greenwich Land defendants and third parties (1.1); review, revise deposition notices regarding same (.4); review revise rule 30(b)(6) topics lists regarding same (.6); correspond with N. Bassett regarding Greenwich Land document review (.2)	2.30	1,235.00	2,840.50
07/20/2023	ECS1	Prepare subpoenas and deposition notices in connection with Greenwich Land adversary proceeding fact discovery	0.10	1,015.00	101.50
07/20/2023	KC27	Prepare parts of objection to withdrawal of reference	4.30	915.00	3,934.50
07/20/2023	LAD4	Review discovery certification	0.70	1,860.00	1,302.00
07/20/2023	AEL2	Draft objection to motion for extension of expert identification	1.30	1,625.00	2,112.50
07/20/2023		Revise rule 30(b)(6) deposition notice to Greenwich Land and potential deponents	0.90	815.00	733.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2023	NAB	Review and revise draft deposition notices (4); correspond with A. Luft and E. Sutton regarding same (.5)	0.90	1,625.00	1,462.50
07/21/2023	DEB4	Correspond with regarding witness declaration	0.10	1,320.00	132.00
07/21/2023	DEB4	Correspond with A. Luft regarding evidentiary issues	0.10	1,320.00	132.00
07/21/2023	ECS1	Prepare objection to defendants' motion to extend expert witness deadline (.7); correspond with A. Luft regarding same (.1)	0.80	1,015.00	812.00
07/21/2023	ECS1	Call with regarding discovery and depositions in Greenwich Land adversary proceeding (.8); prepare subpoenas and deposition notices regarding same (1.0); correspond with and deposition targets regarding same (.3)	2.10	1,015.00	2,131.50
07/21/2023	ECS1	Attend document review protocol and training session with W. Farmer, and UnitedLex regarding G Club and Greenwich Land related document productions	0.70	1,015.00	710.50
07/21/2023	KC27	Prepare parts of objection to withdrawal of the reference motion	7.30	915.00	6,679.50
07/21/2023	AEL2	Analysis of Ngok testimony with documents	2.40	1,625.00	3,900.00
07/21/2023	AEL2	Review M. Jeffrey documents for use in depositions	2.10	1,625.00	3,412.50
07/21/2023	AEL2	Edit motion to extend time	1.10	1,625.00	1,787.50
07/21/2023		Conference with E. Sutton on Greenwich Land discovery	0.80	815.00	652.00
07/21/2023		Conference with UnitedLex, W. Farmer and E. Sutton regarding document review protocol for Greenwich Land	0.70	815.00	570.50
07/21/2023		Prepare and serve deposition notices on Greenwich Land, Hing Chi Ngok and Emile de Neree	1.30	815.00	1,059.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/21/2023	NAB	Correspond with A. Luft regarding depositions	0.20	1,625.00	325.00
07/21/2023	WCF	Draft document review protocol for Greenwich Land documents (1.3); prepare presentation regarding same (.7); present training to UnitedLex with E. Sutton and regarding Greenwich Land document review (.7)	2.70	1,235.00	3,334.50
07/22/2023	KC27	Prepare parts of response to motion to withdraw the reference	6.00	915.00	5,490.00
07/23/2023	ECS1	Review Kathy Sloane and Martha Jeffrey's production in connection with potential deposition in Greenwich Land adversary (.9); correspond with A. Luft and D. Barron regarding same (.2)	1.10	1,015.00	1,116.50
07/23/2023	KC27	Prepare parts of objection to withdrawal of reference	5.00	915.00	4,575.00
07/23/2023	NAB	Review updates on discovery requests and deposition notices	0.20	1,625.00	325.00
07/24/2023	DEB4	Analyze documents in connection with Greenwich Land evidentiary issues (1.2); correspond with E. Sutton and A. Luft regarding same (0.2)	1.40	1,320.00	1,848.00
07/24/2023	KC27	Prepare parts of response to motion to withdraw reference	4.90	915.00	4,483.50
07/24/2023	AEL2	Correspond with D. Barron re: potential deposition and declaration targets	0.30	1,625.00	487.50
07/24/2023	WCF	Correspond with UnitedLex regarding document review parameters and protocol	0.80	1,235.00	988.00
07/25/2023	NAB	Correspond with P. Linsey (NPM) and S. Maza regarding response to motion to withdraw reference	0.40	1,625.00	650.00
07/25/2023	SM29	Analyze case law re objection to withdrawal of the reference (4.5); prepare parts of objection to motion to withdraw the reference (2.8); email L. Despins and N. Bassett re same (.1)	7.40	1,320.00	9,768.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2023	DEB4	Correspond with D. Mohamed regarding notice of appearance	0.20	1,320.00	264.00
07/26/2023	DEB4	Conference with S. Maza regarding withdrawal of reference and related objection	0.60	1,320.00	792.00
07/26/2023	DEB4	Analyze objections to withdrawal of reference	0.80	1,320.00	1,056.00
07/26/2023	KC27	Review revised response to withdrawal of reference motion	0.20	915.00	183.00
07/26/2023	SM29	Prepare part of objection to motion to withdraw the reference (3.5); call with D. Barron re same (.6)	4.10	1,320.00	5,412.00
07/27/2023	DEB4	Conferences with S. Maza regarding objection to withdrawal of reference	0.50	1,320.00	660.00
07/27/2023	DEB4	Prepare section of objection to withdrawal of reference	1.50	1,320.00	1,980.00
07/27/2023	DEB4	Conference with regarding objection to withdrawal of reference	0.40	1,320.00	528.00
07/27/2023	KC27	Review N. Bassett comments to withdrawal of reference response (.4); prepare parts of same (1.0); analyze case law cited in motion to withdraw reference (2.6); call with S. Maza regarding same (.4); correspond with S. Maza regarding same (.4)	4.80	915.00	4,392.00
07/27/2023	LAD4	Analyze/comment on withdrawal of the reference issues	2.40	1,860.00	4,464.00
07/27/2023	LAD4	Emails to/from N. Bassett, S. Maza re: withdrawal of the reference	0.90	1,860.00	1,674.00
07/27/2023		Prepare part of response to Defendant's motion to withdraw the reference (3.1); call with D. Barron regarding same (.4)	3.50	815.00	2,852.50
07/27/2023	NAB	Correspond with W. Farmer regarding deposition and document discovery issues (.2); call with W. Farmer regarding same (.2)	0.40	1,625.00	650.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/27/2023	NAB	Review and revise draft response to motion to withdraw reference (2.5); calls with S. Maza regarding same (.4); analyze case law regarding same (.8)	3.70	1,625.00	6,012.50
07/27/2023	SM29	Analyze objection to motion to withdraw the reference (6.6); calls with D. Barron re same and strategy for response (.5); correspond with D. Barron and re same and response (.3); call with K. Catalano re same and response (.4); calls with N. Bassett re same and strategy for response (.4)	8.20	1,320.00	10,824.00
07/27/2023	WCF	Analyze responses and objections to Trustee's Greenwich Land discovery requests (1.5); call with N. Bassett regarding same (.2); draft talking points for discovery conference with Greenwich Land defendants' counsel (1.1)	2.80	1,235.00	3,458.00
07/28/2023	DEB4	Conferences with S. Maza regarding objection to motion to withdraw reference	0.40	1,320.00	528.00
07/28/2023	DEB4	Correspond with L. Despina regarding Yvette Wang's role at Greenwich Land	0.10	1,320.00	132.00
07/28/2023	DEB4	Analyze revised objection to motion to withdraw the reference	0.40	1,320.00	528.00
07/28/2023	DEB4	Correspond with S. Maza, E. Sutton and K. Catalano regarding objection to withdrawal of reference	0.50	1,320.00	660.00
07/28/2023	ECS1	Correspond with D. Mohamed, S. Maza, and D. Barron regarding evidentiary hearings and written opinions issued by the court in connection with response to motion to withdraw the reference	0.30	1,015.00	304.50
07/28/2023	JK21	Revise response to motion to withdraw the reference	5.20	540.00	2,808.00
07/28/2023	KC27	Prepare parts of response to motion to withdraw reference	6.30	915.00	5,764.50
07/28/2023	LAD4	Review/edit opposition to motion to withdraw the reference	2.60	1,860.00	4,836.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/28/2023		Review main case docket sheet regarding evidentiary hearings	0.20	815.00	163.00
07/28/2023	NAB	Correspond with W. Farmer regarding discovery issues	0.30	1,625.00	487.50
07/28/2023	NAB	Review and revise draft response to motion to withdraw reference (2.6); correspond with S. Maza regarding same (.3); calls with S. Maza regarding same (.3); analyze case law relating to same (1.1); further correspond with L. Despins, S. Maza regarding same (.2)	4.50	1,625.00	7,312.50
07/28/2023	SM29	Analyze objection to motion to withdraw the reference (1.6); calls with D. Barron regarding same (.4); analyze response to same (2.7); calls with N. Bassett regarding same (.3)	5.00	1,320.00	6,600.00
07/28/2023	WCF	Correspond with UnitedLex regarding second level review parameters, privilege log, and targeted searches (.8); analyze responsive non-privileged documents regarding production to Greenwich Land defendants (2.6)	3.40	1,235.00	4,199.00
07/29/2023	NAB	Correspond with W. Farmer regarding document production issues	0.10	1,625.00	162.50
07/29/2023	WCF	Review initial production to Greenwich Land defendants	0.90	1,235.00	1,111.50
07/30/2023	NAB	Analyze Greenwich Land discovery issues	0.30	1,625.00	487.50
07/31/2023	ECS1	Prepare topics for Ngok deposition in connection with Greenwich Land adversary proceeding	0.20	1,015.00	203.00
07/31/2023	ECS1	Perform quality control review of documents subject to potential production to Greenwich Land (2.0); call with W. Farmer and about same (.3)	2.30	1,015.00	2,334.50
07/31/2023		Review documents on Relativity to prepare for Greenwich Land's initial production	4.40	815.00	3,586.00
07/31/2023		Conference with W. Farmer and E. Sutton on Greenwich Land document production	0.30	815.00	244.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/31/2023	NAB	Review and revise requests for production (.7); correspond with W. Farmer regarding same (.3); review and revise draft interrogatories and requests for admissions (.6); review complaint and case documents in connection with same (.5); further correspond with W. Farmer regarding same (.3)	2.40	1,625.00	3,900.00
07/31/2023	WCF	Call with E. Sutton and regarding second level document review for production to Greenwich Land defendants (.3); correspond with producing party custodians regarding consent for production of documents under protective order (.6); correspond with UnitedLex regarding production revisions and planning (.3)	1.20	1,235.00	1,482.00
Subtotal: B191 General Litigation			270.20		323,941.00
Total			270.20		323,941.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	7.80	1,860.00	14,508.00
NAB	Nicholas A. Bassett	Partner	22.40	1,625.00	36,400.00
AEL2	Luft, Avi E.	Of Counsel	33.70	1,625.00	54,762.50
SM29	Shlomo Maza	Associate	33.40	1,320.00	44,088.00
DEB4	Douglass E. Barron	Associate	15.70	1,320.00	20,724.00
WCF	Will C. Farmer	Associate	42.40	1,235.00	52,364.00
ECS1	Ezra C. Sutton	Associate	20.00	1,015.00	20,300.00
AG30	Anuva V. Ganapathi	Associate	3.30	915.00	3,019.50
KC27	Kristin Catalano	Associate	52.10	915.00	47,671.50
		Associate	32.10	815.00	26,161.50
JK21	Jocelyn Kuo	Paralegal	7.30	540.00	3,942.00

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Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
07/13/2023	Photocopy Charges	41.00	0.08	3.28
07/11/2023	Lexis/On Line Search			224.68
07/18/2023	Lexis/On Line Search			26.95
07/18/2023	Lexis/On Line Search			26.95
07/18/2023	Westlaw			16.96
07/18/2023	Westlaw			212.90
07/18/2023	Computer Search (Other)			4.14
07/19/2023	Westlaw			195.76
07/20/2023	Westlaw			30.97
07/21/2023	Westlaw			123.87
07/21/2023	Computer Search (Other)			0.27
07/22/2023	Westlaw			166.45
07/24/2023	Westlaw			31.52
07/27/2023	Westlaw			23.78
07/27/2023	Computer Search (Other)			2.70
07/28/2023	Westlaw			119.26
Total Costs incurred and advanced				\$1,210.44

Current Fees and Costs **\$325,151.44**

Total Balance Due - Due Upon Receipt **\$325,151.44**



PAUL HASTINGS LLP
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Luc Despina as Chapter 11 Trustee in the case of Ho Wan September 18, 2023
Kwok

200 Park Avenue
New York, NY 10166

Please Refer to
Invoice Number: 2371608

Attn: Luc Despina

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

General Chapter 11 Trustee Representation

PH LLP Client/Matter # 50687-00001

Luc A. Despina

Legal fees for professional services for the period ending August 31, 2023	\$232,991.50
Costs incurred and advanced	5,583.36
Current Fees and Costs Due	\$238,574.86
Total Balance Due - Due Upon Receipt	\$238,574.86

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
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Luc Despina as Chapter 11 Trustee in the case of Ho Wan September 18, 2023
Kwok

200 Park Avenue
New York, NY 10166

Please Refer to
Invoice Number: 2371608

Attn: Luc Despina

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

General Chapter 11 Trustee Representation

PH LLP Client/Matter # 50687-00001
Luc A. Despina

Legal fees for professional services for the period ending August 31, 2023	\$232,991.50
Costs incurred and advanced	5,583.36
Current Fees and Costs Due	\$238,574.86
Total Balance Due - Due Upon Receipt	\$238,574.86

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho Wan September 18, 2023
Kwok

200 Park Avenue
New York, NY 10166

Please Refer to
Invoice Number: 2371608

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending August 31, 2023

General Chapter 11 Trustee Representation

\$232,991.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 Case Administration					
08/01/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review and update working group re upcoming filing deadlines (.2)	1.00	540.00	540.00
08/01/2023	DEB4	Correspond with H. Claiborn (UST) regarding quarterly fees	0.10	1,320.00	132.00
08/01/2023	NAB	Review issues/task list, general case strategy and next steps	0.30	1,625.00	487.50
08/02/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review and update working group re upcoming filing deadlines (.2)	0.90	540.00	486.00
08/02/2023	LAD4	T/c H. Claiborn (UST) re: update on case (.40); t/c S. Sarnoff, P. Friedman (OMM), N. Bassett re: update on case (.40)	0.80	1,860.00	1,488.00
08/02/2023	NAB	Call with L. Despins, I. Goldman (Committee counsel), P. Friedman (OMM), and S. Sarnoff (OMM) regarding TRO ruling and case update	0.40	1,625.00	650.00
08/03/2023	AB21	Update list of open issues and workstreams	0.20	1,625.00	325.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2023	DM26	Update critical dates calendar and send outlook reminders (.5); review and update working group re upcoming filing deadlines (.2)	0.70	540.00	378.00
08/03/2023	JK21	Correspond with J. Kosciwicz regarding July 18, 2023 hearing transcript	0.20	540.00	108.00
08/04/2023	AB21	Update list of open issues and workstreams	0.10	1,625.00	162.50
08/04/2023	DM26	Update critical dates calendar and send outlook reminders (.5); review and update working group re upcoming filing deadlines (.2)	0.70	540.00	378.00
08/04/2023	NAB	Call with S. Sarnoff (OMM) regarding chapter 11 case developments	0.20	1,625.00	325.00
08/07/2023	DM26	Update critical dates calendar and send outlook reminders (1.5); review and share with working group upcoming filing deadlines (.2)	1.70	540.00	918.00
08/08/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review and share with working group upcoming filing deadlines (.2)	1.00	540.00	540.00
08/09/2023	DM26	Update critical dates calendar and send outlook reminders (.9); review and share with working group upcoming filing deadlines (.2)	1.10	540.00	594.00
08/10/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review and share with working group upcoming filing deadlines (.2)	0.90	540.00	486.00
08/11/2023	DM26	Update critical dates calendar and send outlook reminders (.5); review and share with working group upcoming filing deadlines (.2)	0.70	540.00	378.00
08/14/2023	DM26	Update critical dates calendar and send outlook reminders (1.6); review and share with working group upcoming filing deadlines (.2)	1.80	540.00	972.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/2023	DM26	Update critical dates calendar and send outlook reminders (.8); review and share with working group upcoming filing deadlines (.2)	1.00	540.00	540.00
08/16/2023	AB21	Update list of open issues and workstreams	0.10	1,625.00	162.50
08/16/2023	DM26	Update critical dates calendar and send outlook reminders (.6); review and update working group re upcoming filing deadlines (.2)	0.80	540.00	432.00
08/17/2023	DM26	Update critical dates calendar and send outlook reminders (.4); review and update working group re upcoming filing deadlines (.2)	0.60	540.00	324.00
08/18/2023	DM26	Update critical dates calendar and send outlook reminders (1.7); review and update working group re upcoming filing deadlines (.2)	1.90	540.00	1,026.00
08/20/2023	AB21	Calls with S. Maza regarding open issues and workstreams in Kwok case (0.2); update summary regarding same (0.1)	0.30	1,625.00	487.50
08/20/2023	SM29	Calls with A. Bongartz re open issues for upcoming week (.2); prepare summary regarding same (.5)	0.70	1,320.00	924.00
08/21/2023	DM26	Update critical dates calendar and send outlook reminders (.6); review and update working group re upcoming filing deadlines (.2)	0.80	540.00	432.00
08/22/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review and update working group re upcoming filing deadlines (.2)	0.90	540.00	486.00
08/23/2023	DM26	Update critical dates calendar and send outlook reminders (1.2); review and update working group re upcoming filing deadlines (.2)	1.40	540.00	756.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	DM26	Update critical dates calendar and send outlook reminders (1.8); review and update working group re upcoming filing deadlines (.2)	2.00	540.00	1,080.00
08/25/2023	DM26	Update critical dates calendar and send outlook reminders (.3); review and update working group re upcoming filing deadlines (.2); research certain deposition transcripts from main Kwok case and related adversary proceedings for P. Linsey (.8)	1.30	540.00	702.00
08/25/2023	LAD4	T/c S. Millman (Stroock) re: common interest agreement	0.20	1,860.00	372.00
08/28/2023	DM26	Update critical dates calendar and send outlook reminders (.3); review and update working group re upcoming filing deadlines (.2)	0.50	540.00	270.00
08/29/2023	DM26	Update critical dates calendar and send outlook reminders (.7); review and update working group re upcoming filing deadlines (.2)	0.90	540.00	486.00
08/29/2023	LAD4	T/c I. Goldman re: update on case (.50); post-mortem after hearing with I. Goldman (.50)	1.00	1,860.00	1,860.00
08/30/2023	DM26	Update critical dates calendar and send outlook reminders (1.3); review and update working group re upcoming filing deadlines (.3)	1.60	540.00	864.00
Subtotal: B110 Case Administration			28.80		20,552.00

B113 Pleadings Review

08/01/2023	AB21	Review docket update and recent filings	0.10	1,625.00	162.50
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in US Bank v. HK USA case and update working group re same (.1); review recent filings in USA v. Kwok case and update working group re same (.1); review related case dockets regarding recent filings (.5)	1.30	540.00	702.00
08/02/2023	AB21	Review docket update and recent filings	0.10	1,625.00	162.50
08/02/2023	DM26	Review recent filings in Kwok case and update working group re same (.3); review recent filings in certain adversary proceedings and update working group re same (.5); review recent filing in Mei Guo v. Despina District Court case and update working group re same (.1); research requested case documents (.3); review related case dockets regarding recent filings (.5)	1.70	540.00	918.00
08/03/2023	DM26	Review recent filings in Kwok case and update working group re same (.4); review recent filings in Mei Guo v. Despina District Court case and update working group re same (.1); review related case dockets regarding recent filings (.5)	1.00	540.00	540.00
08/04/2023	DM26	Review recent filings in Kwok case and update working group re same (1.2); review recent filings in certain adversary proceedings and update working group re same (.8); review recent filings in Mei Guo v. Judge Manning Connecticut District Court case and update working group re same (.2); review recent filings in USA v. Kwok case and update working group re same (.1); review related case dockets regarding recent filings (.5)	2.80	540.00	1,512.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	DM26	Review recent filings in Kwok case and update working group re same (.9); review recent filings in certain adversary proceedings and update working group re same (.8); review recent filings in USA v. Kwok case and update working group re same (.3); review related case dockets regarding recent filings (.5); research certain case documents at attorney request (.3)	2.80	540.00	1,512.00
08/08/2023	DM26	Review recent filings in Kwok case and update working group re same (.7); review recent filings in certain adversary proceedings and update working group re same (.2); review recent filings in USA v. Kwok case and update working group re same (.1); review related case dockets regarding recent filings (.5); research case dockets regarding Index Nos. 510006/2023, 510007/2023 and 510008/2023 and share with working group (.2)	1.70	540.00	918.00
08/09/2023	DM26	Review recent filings in Kwok case and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (.4); review recent filings in AIG v. Genever Connecticut District Court case and update working group re same (.2); research 5/15/23 subpoena directed to Metropolitan Commercial Bank for P. Linsey (.2); review related case dockets regarding recent filings (.5)	1.90	540.00	1,026.00
08/10/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.5); review recent filings in certain adversary proceedings and update working group re same (.9); review recent filings in USA v. Kwok case no. 23cr118 and update working group re same (.1); review related case dockets regarding recent filings (.5); research certain case documents per attorney request (.3)	2.30	540.00	1,242.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/11/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.7); review recent filings in certain adversary proceedings and update working group re same (.7); review recent filings in Greenwich & Ngok v. Despina District Court case no. 23mc62 and update working group re same (.1); review related case dockets regarding recent filings (.5)	2.00	540.00	1,080.00
08/14/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.8); review recent filings in certain adversary proceedings and update working group re same (1.2); review related case dockets regarding recent filings (.6)	2.60	540.00	1,404.00
08/15/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (.8); review related case dockets regarding recent filings (.6)	2.00	540.00	1,080.00
08/16/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.4); review recent filings in certain adversary proceedings and update working group re same (.5); review recent filings in Mei Guo v. Despina District Court case no. 23cv375 and update working group re same (.1); review related case dockets regarding recent filings (.6); review certain case documents per attorney request (.4)	2.00	540.00	1,080.00
08/17/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.3); review recent filings in AIG v. Genever District Court case no. 23cv1003 and update working group re same (.1); review recent filings in USA v. Kwok case no. 23cr118 and update working group re same (.1); review related case dockets regarding recent filings (.5)	1.00	540.00	540.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (1.1); review recent filings in certain adversary proceedings and update working group re same (.3); review related case dockets regarding recent filings (.5); review certain client files and case documents per attorney request (.4)	2.30	540.00	1,242.00
08/21/2023	AB21	Review chapter 11 docket update and recent filings	0.10	1,625.00	162.50
08/21/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.6); review recent filings in certain adversary proceedings and update working group re same (.3); review recent filings in USA v. Kwok case no. 23cr118 and update working group re same (.1); review related case dockets re recent filings (.5); review certain case documents per attorney request (.4)	1.90	540.00	1,026.00
08/22/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.8); review recent filings in certain adversary proceedings and update working group re same (.3); review recent filings in certain district court cases and update working group re same (.3); review related case dockets regarding recent filings (.5); review certain case documents (.5)	2.40	540.00	1,296.00
08/23/2023	AB21	Review chapter 11 docket update and filings	0.10	1,625.00	162.50
08/23/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (1.0); review recent filings in certain adversary proceedings and update working group re same (.8); review recent filings in Kwok v. Despina District Court case no. 23cv153 and update working group re same (.1); review related case dockets regarding recent filings (.5)	2.40	540.00	1,296.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (1.2); review recent filings in certain adversary proceedings and update working group re same (.5); review recent filings in Greenwich & Ngok v. Despina District Court case no. 23mc62 and update working group re same (.1); review related case dockets regarding recent filings (.5)	2.30	540.00	1,242.00
08/25/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (1.7); review recent filings in certain adversary proceedings and district court case and update working group re same (1.2); review related case dockets re: recent filings (.5)	3.40	540.00	1,836.00
08/28/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.4); review recent filings in certain adversary proceedings and update working group re same (.4); review related case dockets regarding recent filings (.5)	1.30	540.00	702.00
08/29/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.6); review related case dockets regarding recent filings (.5); research certain case documents per attorney request (.5)	1.60	540.00	864.00
08/30/2023	DM26	Review recent filings in Kwok case no. 22-50073 and update working group re same (.8); review recent filings in certain adversary proceedings and district court case and update working group re same (.6); review recent filings in USA v. Kwok case no. 23cr118 and update working group re same (.2); review related case dockets regarding recent filings (.5)	2.10	540.00	1,134.00
Subtotal: B113 Pleadings Review			45.20		24,842.00

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B155 Court Hearings					
08/11/2023	DM26	Prepare draft agenda for 8/15/23 hearing (1.9); prepare internal agenda for 8/14/23 hearing (.8)	2.70	540.00	1,458.00
08/13/2023	DM26	Review and revise agenda for 8/15/23 hearing	1.50	540.00	810.00
08/15/2023	AB21	Correspond with L. Despins regarding August 15 hearing prep	0.10	1,625.00	162.50
08/17/2023	DM26	Prepare agenda for 8/22/23 hearing	1.60	540.00	864.00
08/18/2023	DM26	Update agenda for 8/22/23 hearing	0.40	540.00	216.00
08/21/2023	DM26	Prepare parts of 8/22/23 hearing agenda	0.20	540.00	108.00
08/24/2023	DM26	Prepare draft internal agenda for 8/29/23 hearing	1.40	540.00	756.00
08/25/2023	DM26	Update internal draft agenda for 8/29/23 hearing (.3); correspond with E. Sutton re same (.1); research matters set for hearing and related pleadings (.5)	0.90	540.00	486.00
08/27/2023	DM26	Revise 8/29/23 agenda (.3); review filings and related documents set for hearing (1.7)	2.00	540.00	1,080.00
Subtotal: B155 Court Hearings			10.80		5,940.50
B160 Fee/Employment Applications					
08/01/2023	AB21	Revise PH interim fee application (0.2); call with C. Edge regarding same (0.1); correspond with K. Traxler regarding same (0.2)	0.50	1,625.00	812.50
08/02/2023	AB21	Revise PH fee application (0.6); call and correspond with C. Edge regarding same (0.1); correspond with L. Despins regarding H. Claiborn (U.S. Trustee) comments to interim compensation procedures order (0.2)	0.90	1,625.00	1,462.50

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08/03/2023	AB21	Revise PH interim fee application (1.1); correspond with L. Despins regarding same (0.3); call with P. Linsey (Neubert) regarding same (0.1); call with C. Edge regarding same (0.1)	1.60	1,625.00	2,600.00
08/03/2023	AB21	Correspond with L. Despins regarding interim compensation procedures (0.2); revise same (0.1); correspond with H. Claiborn (U.S. Trustee) regarding same (0.1); call and correspond with P. Linsey regarding same (0.1)	0.50	1,625.00	812.50
08/04/2023	AB21	Revise proposed interim compensation procedures order (0.1); correspond with H. Claiborn (U.S. Trustee) and I. Goldman (Pullman) regarding same (0.1); revise notice of filing of revised proposed order (0.1); correspond with J. Kuo regarding filing of same (0.1)	0.40	1,625.00	650.00
08/04/2023	AB21	Finalize PH fee application (1.7); calls with C. Edge regarding same (0.2); correspond with C. Edge regarding same (0.1); calls with P. Linsey (Neubert) regarding filing of same (0.1); correspond with P. Linsey regarding same (0.1); revise motion regarding service of PH fee application (0.4); correspond with J. Kuo regarding same (0.1); correspond with P. Linsey regarding filing of same (0.1)	2.80	1,625.00	4,550.00
08/04/2023	JK21	Prepare notice of revised proposed interim compensation order (0.6); electronically file with the court notice of revised proposed interim compensation order (0.3)	0.90	540.00	486.00
08/04/2023	JK21	Prepare motion to limit service of second interim fee application	1.80	540.00	972.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	AB21	Prepare motion for leave to file PH and NPM fee applications (2.2); calls with P. Linsey (Neubert) regarding same (0.3); correspond with L. Despins regarding same (0.4); correspond with P. Linsey regarding same (0.2); correspond with J. Kuo regarding service of PH fee application (0.1)	3.20	1,625.00	5,200.00
08/07/2023	JK21	Correspond with A. Bongartz regarding service of second interim fee application (0.2); review and comment on service of second interim fee application (0.3)	0.50	540.00	270.00
08/08/2023	AB21	Correspond with H. Claiborn (U.S. Trustee) regarding LEDES files for PH interim fee application	0.10	1,625.00	162.50
08/08/2023	AB21	Revise notice of PH rate adjustment	0.10	1,625.00	162.50
08/08/2023	JK21	Electronic service of Paul Hastings second interim fee application (0.2); prepare certificate of service regarding Paul Hastings second interim fee application (0.6); electronically file with the court Paul Hastings second interim fee application (0.3)	1.10	540.00	594.00
08/09/2023	AB21	Finalize notice of rate adjustment (0.1); correspond with J. Kuo regarding filing and service of same (0.1)	0.20	1,625.00	325.00
08/09/2023	AB21	Correspond with L. Despins regarding interim compensation procedures	0.40	1,625.00	650.00
08/09/2023	JK21	Prepare for electronic filing notice of rate change	0.30	540.00	162.00
08/09/2023	JK21	Correspond with P. Linsey (NPM) regarding service of notice of hearing on motion to file fee applications before expiration of 120 day period	0.20	540.00	108.00
08/10/2023	JK21	Electronically file with the court notice of rate change (0.3); review and comment on additional service of notice of rate change (0.2)	0.50	540.00	270.00

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08/14/2023	AB21	Correspond with L. Despina regarding preparation for hearing on interim compensation procedures order and additional matters scheduled for August 15 hearing (0.3); correspond with E. Sutton regarding same and hearing agenda (0.1)	0.40	1,625.00	650.00
08/14/2023	AB21	Prepare cover sheet and format for monthly fee statements	0.70	1,625.00	1,137.50
08/15/2023	AB21	Call with K. Traxler regarding update on interim compensation procedures (0.2); revise template for monthly fee statements (0.1)	0.30	1,625.00	487.50
08/15/2023	AB21	Call with E. Sutton regarding supplemental declaration in support of PH retention	0.10	1,625.00	162.50
08/15/2023	DEB4	Conference with E. Sutton regarding supplemental retention declaration	0.10	1,320.00	132.00
08/15/2023	ECS1	Prepare the Trustee's seventh supplemental declaration of disinterestedness (1.8); call with A. Bongartz regarding same (.1); call with D. Barron regarding same (.1); correspond with J. Kuo regarding same (.1)	2.10	1,015.00	2,131.50
08/15/2023	JK21	Update parties in interest list for professional retention purposes	3.30	540.00	1,782.00
08/15/2023	KAT2	Call with A. Bongartz regarding interim compensation order (.2); review same (.1); correspond with C. Edge regarding same (.2)	0.50	1,025.00	512.50
08/16/2023	ECS1	Correspond with PH Conflicts Department regarding new parties in interest	0.10	1,015.00	101.50
08/16/2023	ECS1	Prepare Trustee's seventh supplemental declaration of disinterestedness (.1); correspond with A. Bongartz and J. Kuo regarding same (.1)	0.20	1,015.00	203.00
08/16/2023	JK21	Update parties in interest list for professional retention purposes	0.40	540.00	216.00
08/17/2023	AB21	Begin review of PH July monthly fee statement	0.70	1,625.00	1,137.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2023	ECS1	Prepare the Trustee's seventh supplemental declaration regarding retention (.4); correspond with A. Bongartz regarding same (.1)	0.50	1,015.00	507.50
08/17/2023	KAT2	Correspond with A. Bongartz regarding fee matters	0.20	1,025.00	205.00
08/18/2023	AB21	Continue review of PH July fee statement	0.80	1,625.00	1,300.00
08/20/2023	AB21	Review draft supplemental declaration in support of PH retention (0.1); correspond with E. Sutton regarding same (0.1)	0.20	1,625.00	325.00
08/21/2023	AB21	Correspond with E. Sutton regarding supplemental declaration in support of PH retention (0.1); correspond with L. Despins regarding same (0.1)	0.20	1,625.00	325.00
08/21/2023	ECS1	Review information regarding Sotheby's for supplemental declaration regarding retention	0.10	1,015.00	101.50
08/21/2023	ECS1	Continue preparing the Trustee's seventh supplemental declaration regarding retention	0.30	1,015.00	304.50
08/23/2023	KAT2	Prepare UST Appendix B information regarding July services for next interim fee application	0.60	1,025.00	615.00
08/24/2023	KAT2	Correspond with C. Edge regarding monthly fee application for July services (.1); review and revise same (.1)	0.20	1,025.00	205.00
08/28/2023	AB21	Review PH July fee statement (0.8); correspond with C. Edge regarding same (0.1)	0.90	1,625.00	1,462.50
08/30/2023	AB21	Correspond with C. Edge regarding form of monthly fee statement	0.10	1,625.00	162.50
08/31/2023	AB21	Correspond with L. Despins and P. Linsey (NPM) regarding second interim PH fee application (0.2); finalize PH July monthly fee statement (0.3)	0.50	1,625.00	812.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	JK21	Correspond with E. Sutton regarding parties in interest	0.40	540.00	216.00
Subtotal: B160 Fee/Employment Applications			29.90		35,445.00

B165 Fee/Employment Applications for Other Professionals

08/02/2023	ECS1	Review additional parties in interest in connection with Kroll retention	0.10	1,015.00	101.50
08/03/2023	AB21	Review Neubert Pepe fee application	0.70	1,625.00	1,137.50
08/03/2023	AB21	Correspond with L. Despins regarding tax accountant (0.1); correspond with D. Skalka (Neubert) and P. Linsey (Neubert) regarding same (0.1)	0.20	1,625.00	325.00
08/03/2023	AEL2	Correspond with L. Despins re: Kroll rate proposal	0.30	1,625.00	487.50
08/04/2023	AB21	Review revised draft of Neubert Pepe fee application	0.10	1,625.00	162.50
08/04/2023	DEB4	Conference with P. Linsey (NPM) regarding Kroll retention	0.10	1,320.00	132.00
08/04/2023	DEB4	Correspond with L. Despins regarding Kroll retention	0.10	1,320.00	132.00
08/04/2023	AEL2	Review Kroll proposed terms of engagement	1.80	1,625.00	2,925.00
08/07/2023	LAD4	Review/edit Kroll engagement letter	0.90	1,860.00	1,674.00
08/07/2023	AEL2	Mark up Kroll engagement letter	1.00	1,625.00	1,625.00
08/08/2023	DEB4	Correspond with P. Linsey regarding Kroll engagement letter	0.10	1,320.00	132.00
08/08/2023	AEL2	Correspond with Kroll re: engagement agreement	1.10	1,625.00	1,787.50
08/08/2023	AEL2	Correspond with L. Despins re: edits to Kroll engagement letter	0.20	1,625.00	325.00
08/09/2023	DEB4	Correspond with P. Linsey (NPM) regarding Kroll retention	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/2023	AEL2	Revise terms of draft Kroll engagement letter	0.70	1,625.00	1,137.50
08/11/2023	DEB4	Correspond with P. Linsey (NPM) regarding Kroll engagement	0.10	1,320.00	132.00
08/11/2023	ECS1	Review revised engagement agreement with Kroll	0.10	1,015.00	101.50
08/11/2023	LAD4	Review/edit re-draft of Kroll engagement letter	0.70	1,860.00	1,302.00
08/11/2023	AEL2	Revise Kroll engagement letter	0.30	1,625.00	487.50
08/14/2023	AB21	Correspond with L. Despins regarding Harneys Legal fee application and Pallas fee statement	0.20	1,625.00	325.00
08/15/2023	AB21	Review Harneys' fee statements (0.4); correspond with L. Despins regarding same (0.3)	0.70	1,625.00	1,137.50
08/15/2023	AB21	Call with P. Linsey (Neubert) regarding tax accountant	0.10	1,625.00	162.50
08/16/2023	AB21	Review draft of Harneys first interim fee application (0.9); call with G. Weston (Harneys) regarding same (0.2)	1.10	1,625.00	1,787.50
08/16/2023	KC27	Review Kroll engagement letter and attachments (.7); call with A. Luft regarding same (.3); summarize same (.2); correspond with A. Luft regarding same (.1)	1.30	915.00	1,189.50
08/16/2023	AEL2	Correspond with K. Catalano re: Kroll engagement edits (.1); call with K. Catalano re: same (.3)	0.40	1,625.00	650.00
08/17/2023	AB21	Correspond with G. Weston (Harneys Legal) regarding Harneys Legal fee application	0.10	1,625.00	162.50
08/17/2023	AEL2	Call with A. Pfeiffer re negotiating terms of Kroll engagement	0.90	1,625.00	1,462.50
08/17/2023	AEL2	Review and revise engagement agreement for Kroll	1.10	1,625.00	1,787.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	AB21	Call with G. Weston (Harneys Legal) regarding Harneys fee application (0.5); revise same (0.4); correspond with L. Despins regarding same (0.2); correspond with A. Thorp (Harneys Legal) and G. Weston regarding same (0.1)	1.20	1,625.00	1,950.00
08/18/2023	AB21	Correspond with D. Bohannon (Bohannon Law) regarding order granting retention application	0.10	1,625.00	162.50
08/20/2023	AB21	Call with D. Barron regarding retention of tax accountant (0.2); correspond with D. Barron regarding same (0.1)	0.30	1,625.00	487.50
08/20/2023	DEB4	Conference with A. Bongartz regarding accountant retention	0.20	1,320.00	264.00
08/22/2023	DEB4	Correspond with L. Despins regarding tax accountant retention	0.10	1,320.00	132.00
08/24/2023	DEB4	Conference with P. Linsey (NPM) regarding Kroll retention application	0.30	1,320.00	396.00
08/29/2023	AB21	Call with D. Courtney (Pallas) regarding Pallas monthly fee statement (0.3); correspond with D. Courtney regarding same (0.3)	0.60	1,625.00	975.00
08/30/2023	AE12	Review and comment on revised Kroll engagement agreement	1.10	1,625.00	1,787.50
08/31/2023	AB21	Call with A. Thorp (Harneys Legal) regarding Harneys Legal monthly fee statements (0.3); correspond with A. Thorp regarding same (0.3)	0.60	1,625.00	975.00
08/31/2023	DEB4	Correspond with A. Luft regarding Kroll retention application (0.1); correspond with E. Sutton regarding same (0.1); correspond with A. Pfeiffer (Kroll) regarding same (0.1)	0.30	1,320.00	396.00
08/31/2023	ECS1	Correspond with D. Barron and J. Kuo regarding new parties in interest in connection with Kroll's retention application	0.20	1,015.00	203.00

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08/31/2023	AEL2	Review and comment on Kroll retention application	0.40	1,625.00	650.00
Subtotal: B165 Fee/Employment Applications for Other Professionals			20.00		31,282.00
 B210 Business Operations					
08/02/2023	AB21	Correspond with T. Sadler regarding trustee bond	0.20	1,625.00	325.00
08/03/2023	AB21	Correspond with L. Despins regarding trustee bond (0.2); correspond with T. Sadler regarding same (0.2); correspond with H. Claiborn (U.S. Trustee) regarding same (0.1)	0.50	1,625.00	812.50
08/03/2023	TS21	Correspond re surety bond with International Securities (.5); correspond with A. Bongartz re bank balances (.2).	0.70	1,175.00	822.50
08/08/2023	TS21	Review and handle payment re surety bond premium invoice	0.40	1,175.00	470.00
08/10/2023	DEB4	Correspond with T. Sadler regarding Trustee accounts	0.20	1,320.00	264.00
08/10/2023	TS21	Prepare wire transfer form for HCHK (.3); correspond with D. Barron, L. Despins and East West bank re same (.3).	0.60	1,175.00	705.00
08/15/2023	TS21	Review bank account balances and transfers (.9); correspond with A. Bongartz re same (.3)	1.20	1,175.00	1,410.00
08/16/2023	AB21	Call with T. Sadler regarding trustee account balances	0.10	1,625.00	162.50
08/16/2023	TS21	Correspond with L. Despins re bank statements (.2); call with A. Bongartz regarding same (.1)	0.30	1,175.00	352.50
08/24/2023	TS21	Prepare wire transfer form (.2); correspond with L. Despins and E. Sutton re same (.4)	0.60	1,175.00	705.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	TS21	Prepare wire transfer request (.3); correspond with L. Despins and EastWest bank re same (.2)	0.50	1,175.00	587.50
08/29/2023	TS21	Prepare wire transfer form (.3); correspond with A. Bongartz, L. Despins and East West bank re same (.2).	0.50	1,175.00	587.50
08/30/2023	TS21	Prepare wire transfer forms for Gallagher Basset and Safe Harbor (.6); correspond with L. Despins, A. Bongartz and EastWest bank re same (.3)	0.90	1,175.00	1,057.50
08/31/2023	AB21	Analyze cash sources and uses	0.50	1,625.00	812.50
Subtotal: B210 Business Operations			7.20		9,074.00

B211 Financial Reports (Monthly Operating Reports)

08/17/2023	DEB4	Correspond with T. Sadler regarding MOR	0.10	1,320.00	132.00
08/18/2023	DEB4	Correspond with T. Sadler regarding MOR	0.20	1,320.00	264.00
08/18/2023	TS21	Prepare July monthly operating report (2.3); correspond with D. Barron and L. Despins regarding same (.4)	2.70	1,175.00	3,172.50
08/21/2023	DM26	File via the Court's CM/ECF system the monthly operating report for period ended 7/31/23	0.30	540.00	162.00
08/21/2023	TS21	Correspond with L. Despins regarding July monthly operating report (.3); revise monthly operating report (.2); correspond with D. Mohamed regarding filing monthly operating report (.1)	0.60	1,175.00	705.00
Subtotal: B211 Financial Reports (Monthly Operating Reports)			3.90		4,435.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B230 Financing/Cash Collections					
08/01/2023	AB21	Call with L. Despins and S. Maza regarding interdebtor DIP (0.3); correspond with S. Maza regarding same (0.1); call with S. Maza regarding same (0.2); correspond with L. Despins regarding same (0.1); analyze SN claims (1.5); correspond with L. Despins regarding same (0.2); calls with D. Barron regarding same (0.1); correspond with S. Millman (Stroock) regarding same (0.1); revise interdebtor DIP credit agreement (1.6); correspond with M. Grabis regarding same (0.2)	4.40	1,625.00	7,150.00
08/01/2023	DEB4	Conferences with A. Bongartz regarding Sherry Netherland claim issues (0.1); analyze same (0.3)	0.40	1,320.00	528.00
08/01/2023	LAD4	T/c S. Maza & A. Bongartz re: security interest of S-N (.30); review strategy re: same (1.30)	1.60	1,860.00	2,976.00
08/01/2023	MG21	Revise DIP credit agreement (.5); review updated draft of same (.2); related correspondence with A. Bongartz (.2)	0.90	1,290.00	1,161.00
08/01/2023	SM29	Review Sherry Netherland lease documents in connection with DIP issues (.7); email B. Langer re same (.2); call with A. Bongartz re same (.2); call with A. Bongartz and L. Despins re same (.3); review email to S. Millman (counsel to SN) re DIP (.1); correspond with A. Bongartz re DIP credit agreement advances (.1); correspond with A. Bongartz re perfection (.1)	1.70	1,320.00	2,244.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	AB21	Revise interdebtor DIP motion (1.5); correspond with S. Maza regarding same (0.1); correspond with L. Despins regarding same (0.1); correspond with B. Langer regarding same (0.1); call with B. Langer regarding same (0.1); analyze issues related to interdebtor DIP and comments from S. Millman (Stroock) on same (0.7); call with L. Despins regarding same (0.2)	2.80	1,625.00	4,550.00
08/02/2023	LAD4	T/c A. Bongartz re: DIP financing (.20); several emails with A. Bongartz re: same (.90)	1.10	1,860.00	2,046.00
08/02/2023	SM29	Review markup of DIP motion from S. Millman (Stroock)	0.90	1,320.00	1,188.00
08/03/2023	AB21	Correspond with S. Maza regarding interdebtor DIP issues (0.1); correspond with L. Despins regarding same (0.1)	0.20	1,625.00	325.00
08/03/2023	SM29	Correspond with A. Bongartz re post-petition fees and post-petition claims	0.20	1,320.00	264.00
08/04/2023	AB21	Call with E. Sutton regarding postpetition interest on secured claims (0.2); call with L. Despins regarding same (0.1)	0.30	1,625.00	487.50
08/04/2023	ECS1	Analyze court's equitable powers to reduce postpetition interest rate of oversecured creditor (1.7); draft summary of findings (.7); call with A. Bongartz about same (.2)	2.60	1,015.00	2,639.00
08/04/2023	LAD4	Review/edit DIP docs (.90); t/c A. Bongartz re: same (.10); emails to/from A. Bongartz re: same (.40)	1.40	1,860.00	2,604.00
08/07/2023	AB21	Analyze issues related to interdebtor DIP financing (0.3); calls with S. Maza regarding same (1.3); call with L. Despins and S. Maza regarding same (0.3); correspond with S. Maza regarding same (0.1); correspond with L. Despins regarding same (0.1)	2.10	1,625.00	3,412.50
08/07/2023	LAD4	T/c S. Maza, A. Bongartz re: open DIP issues	0.30	1,860.00	558.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	SM29	Calls with A. Bongartz re DIP issues (1.3); call with L. Despins and A. Bongartz re same (.3); analyze case law and statutory authority re post-petition fees and additional claim amounts (6.7)	8.30	1,320.00	10,956.00
08/08/2023	LAD4	T/c S. Millman (Stroock) re: claims settlement (.40); review/comment on same (1.10)	1.50	1,860.00	2,790.00
08/08/2023	SM29	Analyze case law re post-petition claims (3.8); correspond with K. Catalano re same (.3); correspond with L. Despins re same (.1)	4.20	1,320.00	5,544.00
08/09/2023	AB21	Analyze issues regarding SN claim in connection with interdebtor DIP motion (0.5); analyze related authority (1.1); correspond with L. Despins regarding same (0.3); call with S. Maza regarding same (0.3)	2.20	1,625.00	3,575.00
08/09/2023	SM29	Call with A. Bongartz re DIP financing issues and claim amounts	0.30	1,320.00	396.00
08/10/2023	AB21	Call with S. Maza regarding updating proposed interdebtor DIP order and DIP credit agreement (0.1); correspond with S. Maza regarding same (0.1); correspond with L. Despins regarding same (0.1); correspond with L. Despins regarding SN's prepetition claim (0.1); correspond with S. Millman (Stroock) regarding same (0.1)	0.50	1,625.00	812.50
08/10/2023	SM29	Review revised DIP financing motion from A. Bongartz (.4); call with A. Bongartz re same (.1)	0.50	1,320.00	660.00
08/11/2023	AB21	Review revised proposed interdebtor DIP order (0.2); calls with S. Maza regarding same (0.2); call with S. Millman (Stroock) regarding same (0.1); analyze related issues concerning SN claim (0.1); correspond with L. Despins regarding same (0.1)	0.70	1,625.00	1,137.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/11/2023	SM29	Revise DIP order (1.7); calls with A. Bongartz re same (.2); further revise same (.5); correspond with L. Despins re same (.2); email S. Millman (Stroock) re same (.2)	2.80	1,320.00	3,696.00
08/14/2023	AB21	Call with S. Maza regarding interdebtor DIP motion and DIP credit agreement (0.1); correspond with S. Maza regarding same (0.3)	0.40	1,625.00	650.00
08/14/2023	LK19	Telephone call with S. Maza regarding DIP credit agreement (0.2); review DIP financing motion and DIP order (0.7); revise DIP credit agreement (2.4)	3.30	855.00	2,821.50
08/14/2023	MG21	Review revised DIP financing documents (0.4); correspond with S. Maza regarding same (0.2)	0.60	1,290.00	774.00
08/14/2023	SM29	Email M. Grabis re DIP financing documents (.2); call with A. Bongartz re same (.1); correspond with L. Koch re same (.1); call with L. Koch re same (.2)	0.60	1,320.00	792.00
08/15/2023	AB21	Call with S. Maza regarding interdebtor DIP motion	0.10	1,625.00	162.50
08/15/2023	LK19	Revise DIP credit agreement (1.2); correspond with S. Maza regarding same (0.2)	1.40	855.00	1,197.00
08/15/2023	SM29	Review updated DIP documents from L. Koch (.4); email L. Koch re same (.1); email M. Grabis re DIP credit agreement (.2); revise DIP motion re allowed claim (.4); call with A. Bongartz re same and related DIP issues (.1); reply to email from S. Millman (Stroock) re DIP comments (.1); correspond with L. Despins re DIP documents and DIP update (.1); review revised DIP documents before sending to L. Despins (.5)	1.90	1,320.00	2,508.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2023	AB21	Call with S. Maza regarding interdebtor DIP motion (0.1); conference with S. Maza regarding same (0.2); review updated draft of same (0.3); call with S. Maza regarding same (0.1)	0.70	1,625.00	1,137.50
08/16/2023	LK19	Revise DIP credit agreement (1.3); revise DIP financing motion (0.8); revise DIP order (0.4); revise related service motion (0.2); correspond with S. Maza regarding same (0.3)	3.00	855.00	2,565.00
08/16/2023	LAD4	Review/edit DIP motion/docs	0.70	1,860.00	1,302.00
08/16/2023	MG21	Review DIP credit agreement (.1); draft notice of borrowing (.2); correspond with S. Maza and A. Cota regarding same (.1)	0.40	1,290.00	516.00
08/16/2023	SM29	Correspond with L. Koch re changes to DIP documents (.3); correspond with L. Despins re same (.3); conferences with A. Bongartz re same (.3); revise DIP motion to incorporate L. Despins comments (.7); revise DIP order to incorporate L. Despins comments (.5); review markup from L. Koch to DIP motion (.2); review markup from L. Koch to DIP order (.1); review markup from L. Koch to related motion to limit service (.1); call with A. Bongartz re DIP order (.1); review revised DIP credit agreement from M. Grabis (.1); analyze authority re perfection and collateral (.2)	2.90	1,320.00	3,828.00
08/17/2023	AB21	Call with S. Maza regarding updated interdebtor DIP motion (0.2); correspond with S. Millman (Stroock) regarding same (0.1); correspond with P. Friedman (OMM) and I. Goldman (Pullman) regarding same (0.1)	0.40	1,625.00	650.00
08/17/2023	SM29	Correspond with L. Despins re DIP motion (.2); call with A. Bongartz re collateral issues and authority re same (.2); revise DIP documents to incorporate L. Despins comments (.7); correspond with L. Despins re collateral and perfection issues (.2)	1.30	1,320.00	1,716.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	LAD4	T/c S. Millman (Stroock) re: request for fees (.50); review lease issue (.70)	1.20	1,860.00	2,232.00
08/18/2023	SM29	Review comments from S. Millman (Stroock) re revised DIP (.1); correspond with L. Despins and A. Bongartz re same (.1)	0.20	1,320.00	264.00
08/20/2023	AB21	Review correspondence from S. Millman (Stroock) regarding interdebtor DIP motion (0.2); correspond with S. Maza regarding same (0.1)	0.30	1,625.00	487.50
08/20/2023	SM29	Correspond with A. Bongartz re S. Millman (Stroock) comments to DIP	0.20	1,320.00	264.00
08/21/2023	AB21	Review correspondence from L. Despins and S. Maza regarding interdebtor DIP motion	0.10	1,625.00	162.50
08/21/2023	LK19	Review and comment on DIP motion, DIP order, and DIP credit agreement (0.5); correspond with S. Maza regarding same (0.1)	0.60	855.00	513.00
08/21/2023	SM29	Analyze treatment of proprietary leases under the Bankruptcy Code and case law (1.2); email re same (.1)	1.30	1,320.00	1,716.00
08/21/2023	SM29	Review comments from S. Millman (Stroock) to DIP motion and order (.2); correspond with A. Bongartz and L. Despins re same (.3); reply to S. Millman re same (.2); call with S. Millman re same (.2); further correspond with L. Despins re same (.3); revise DIP motion and order (.4); analyze authority re equitable lien (.4); correspond with L. Despins re same (.1); email S. Millman re same (.1)	2.20	1,320.00	2,904.00
08/21/2023	SM29	Email L. Koch re DIP documents	0.10	1,320.00	132.00
08/22/2023	JK21	Prepare for electronic filing the DIP motion and the motion to limit notice	0.40	540.00	216.00
08/22/2023	LK19	Correspond with J. Kuo and S. Maza regarding DIP motion	0.20	855.00	171.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023	SM29	Correspond with J. Kuo re DIP documents (.1); review DIP order (.5); calls with S. Millman (SN) re same (.3); correspond with S. Millman (SN) re same (.2); correspond with L. Despins re same (.2); correspond with J. Kuo and P. Linsey re same (.3)	1.60	1,320.00	2,112.00
08/23/2023	AB21	Calls with S. Maza regarding filing of interdebtor DIP motion	0.20	1,625.00	325.00
08/23/2023	JK21	Electronically file with the court DIP motion (0.3); electronically file with the court motion to limit notice of same (0.3); electronically serve DIP motion and motion to limit notice (0.1); review and comment on additional service of DIP motion and motion to limit notice (0.2)	0.90	540.00	486.00
08/23/2023	LK19	Review and comment on revised DIP motion, DIP order, and DIP credit agreement (0.3); review and comment on DIP motion checklist (0.3); correspond with S. Maza regarding same (0.1)	0.70	855.00	598.50
08/23/2023	LAD4	Review/edit final DIP motion	0.70	1,860.00	1,302.00
08/23/2023	SM29	Correspond with L. Despins re DIP motion and DIP order (.1); revise DIP motion and DIP order to incorporate L. Despins' comments (.3); correspond with P. Linsey (CT counsel) and J. Kuo re DIP motion and local rules (.3); prepare checklist re same (.3); correspond with L. Koch re same (.2); calls with A. Bongartz re DIP filing (.2); review filing version of DIP motion and related DIP documents (.3); email L. Despins re same (.1)	1.80	1,320.00	2,376.00
08/24/2023	JK21	Prepare certificate of service regarding DIP motion and motion to limit service (1.2); electronically file certificate of service regarding DIP motion and motion to limit service (0.2)	1.40	540.00	756.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	JK21	Review and handle service of order limiting notice of DIP motion (0.4); prepare certificate of service regarding order limiting notice of DIP motion (0.2); electronically file with the court certificate of service regarding order limiting notice of DIP motion (0.2)	0.80	540.00	432.00
08/31/2023	AB21	Correspond with L. Despins regarding U.S. Trustee comments to DIP motion	0.30	1,625.00	487.50
Subtotal: B230 Financing/Cash Collections			74.80		100,256.50
 B261 Investigations					
08/22/2023	LAD4	T/c N. Bassett re: contempt appeal	0.20	1,860.00	372.00
Subtotal: B261 Investigations			0.20		372.00
 B310 Claims Administration and Objections					
08/01/2023	DEB4	Correspond with L. Despins regarding creditor inquiry related to proof of claim filing process	0.10	1,320.00	132.00
08/04/2023	DEB4	Correspond with creditor regarding claims process	0.30	1,320.00	396.00
08/07/2023	DEB4	Correspond with creditor regarding claims process	0.20	1,320.00	264.00
Subtotal: B310 Claims Administration and Objections			0.60		792.00
 Total			221.40		232,991.50

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	12.30	1,860.00	22,878.00
NAB	Nicholas A. Bassett	Partner	0.90	1,625.00	1,462.50
AB21	Alex Bongartz	Of Counsel	39.80	1,625.00	64,675.00
AEL2	Luft, Avi E.	Of Counsel	9.30	1,625.00	15,112.50
KAT2	Katherine A. Traxler	Of Counsel	1.50	1,025.00	1,537.50
SM29	Shlomo Maza	Associate	33.70	1,320.00	44,484.00
DEB4	Douglass E. Barron	Associate	3.10	1,320.00	4,092.00
MG21	Maria Grabis	Associate	1.90	1,290.00	2,451.00
TS21	Tess Sadler	Associate	9.00	1,175.00	10,575.00
ECS1	Ezra C. Sutton	Associate	6.30	1,015.00	6,394.50
KC27	Kristin Catalano	Associate	1.30	915.00	1,189.50
LK19	Leonie Koch	Associate	9.20	855.00	7,866.00
JK21	Jocelyn Kuo	Paralegal	13.10	540.00	7,074.00
DM26	David Mohamed	Paralegal	80.00	540.00	43,200.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/03/2023	Photocopy Charges	1,040.00	0.08	83.20
08/04/2023	Photocopy Charges	475.00	0.08	38.00
08/06/2023	Photocopy Charges	1,176.00	0.08	94.08
08/07/2023	Photocopy Charges	1,812.00	0.08	144.96
08/07/2023	Photocopy Charges	425.00	0.08	34.00
08/07/2023	Photocopy Charges	437.00	0.08	34.96
08/10/2023	Photocopy Charges	104.00	0.08	8.32
08/11/2023	Photocopy Charges	2,743.00	0.08	219.44
08/11/2023	Photocopy Charges	4,400.00	0.08	352.00
08/14/2023	Photocopy Charges	1,875.00	0.08	150.00
08/14/2023	Photocopy Charges	750.00	0.08	60.00
08/15/2023	Photocopy Charges	70.00	0.08	5.60

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08/24/2023	Photocopy Charges	264.00	0.08	21.12
05/17/2023	Taxi/Ground Transportation - Skyline Credit Ride, Inc. (USD) (JPMSUA); Invoice # 6056396 dated 05/31/2023; Service Type: Car; From/To: Office/Home; Passenger DAVID, Mohamed; Ticket # 192651 dated 05/17/2023 23:17			57.80
06/23/2023	Taxi/Ground Transportation - Skyline Credit Ride, Inc. (USD) (JPMSUA); Invoice # 6063695 dated 06/30/2023; Service Type: Car; From/To: Office/Home; Passenger DAVID, Mohamed; Ticket # 192719 dated 06/23/2023 23:50			57.80
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; ; BRIAN W. HOFMEISTER; 1325 Avenue of the Americas 19th Fl; New York, NY 100196079 ; 1ZA6T1630198890624 (MAN)			23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; Officer, Managing Ge; HCHK Technologies, Inc.; 251 Little Falls Drive; Wilmington, DE 198081674 ; 1ZA6T1630196477245 (MAN)			23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; OFFICER MANAGING GEN; HCHK Technologies, Inc.; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630197348034 (MAN)			23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; Alex Lipman; Yanping "Yvette" Wang; 147 W. 25th St. 12th Fl; New York, NY 100017229 ; 1ZA6T1630197127068 (MAN)			23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; Priya Chaudhry; Yanping "Yvette" Wang; 147 W. 25th St. 12th Fl; New York, NY 100017229 ; 1ZA6T1630198735677 (MAN)			23.79

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07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; ANTHONY DIBATTISTA; c/o Morvillo Abramowitz Grand Jason; & Anello PC; NEW YORK, NY 100172413 ; 1ZA6T1630195392089 (MAN)	23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; ; BRIAN W. HOFMEISTER; 3131 PRINCETON PIKE; LAWRENCEVILLE, NJ 086482201 ; 1ZA6T1630192170958 (MAN)	23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; Officer, Managing Ge; HCHK Property Management, Inc.; 1209 Orange Street; Wilmington, DE 198011120 ; 1ZA6T1630190258779 (MAN)	23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; Sari B. Placona, Esq; HCHK Entities; 75 Livingston Avenue, 2nd Floor; Roseland, NJ 070683737 ; 1ZA6T1630191264162 (MAN)	23.79
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; ; Joshua I. Sherman, Esq.; 10 Mohawk Drive; Livingston, NJ 070393112 ; 1ZA6T1630193296197 (MAN)	30.53
07/31/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 07/31/2023; ; ANTHONY DIBATTISTA; 45 Park Hill Dr.; HOPEWELL JUNCTION, NY 125335607 ; 1ZA6T1630192030788 (MAN)	36.93
07/31/2023	Lexis/On Line Search - Courtlink Use - Charges for July 2023	16.75
07/31/2023	Computer Search (Other)	66.24
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000930543313; 08/01/2023; K. Traxler; 1Z9305430197166476 (MAN)	34.66
08/01/2023	Computer Search (Other)	13.41
08/02/2023	Westlaw	25.31

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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08/02/2023	Computer Search (Other)	34.02
08/03/2023	Computer Search (Other)	14.67
08/04/2023	Lexis/On Line Search	31.98
08/04/2023	Postage/Express Mail - First Class - US;	38.16
08/04/2023	Postage/Express Mail - First Class - US;	4.23
08/04/2023	Postage/Express Mail - First Class - US;	51.75
08/04/2023	Westlaw	25.31
08/04/2023	Computer Search (Other)	33.57
08/05/2023	Computer Search (Other)	3.15
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; Judge Julie A. Manni; United States Bankruptcy Court; 915 Lafayette Boulevard; Bridgeport, CT 066044727 ; 1ZA6T1632491817370 (MAN)	35.54
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; Holley L. Claiborn; Office of The United States Trustee; 150 Court Street; New Haven, CT 065102022 ; 1ZA6T1632496882746 (MAN)	35.54
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; BERKELEY ROWE; BERKELEY ROWE; 5 MERCHANT SQUARE; LONDON, W 021 ; 1ZA6T1636694466719 (MAN)	55.24
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; QIANG GUO; QIANG GUO; 5 PRINCESS GATE, G3; LONDON, SW071 ; 1ZA6T1636697064693 (MAN)	62.20
08/07/2023	Postage/Express Mail - International;	11.61
08/07/2023	Postage/Express Mail - First Class - US;	13.42
08/07/2023	Postage/Express Mail - First Class - US;	51.75
08/07/2023	Postage/Express Mail - First Class - US;	72.72
08/07/2023	Westlaw	50.62
08/07/2023	Computer Search (Other)	30.33

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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08/08/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/08/2023; Beth Schott; International Sureties, LTD.; Hancock Whitney Center; New Orleans, LA 701396001 ; 1ZA6T1630192113386 (MAN)	23.99
08/08/2023	Westlaw	25.31
08/08/2023	Computer Search (Other)	39.06
08/09/2023	Westlaw	101.24
08/09/2023	Computer Search (Other)	19.80
08/10/2023	Postage/Express Mail - First Class - US;	33.75
08/10/2023	Computer Search (Other)	65.34
08/11/2023	Postage/Express Mail - First Class - US;	50.25
08/11/2023	Postage/Express Mail - International;	58.80
08/11/2023	Postage/Express Mail - First Class - US;	68.60
08/11/2023	Computer Search (Other)	62.28
08/12/2023	Westlaw	177.18
08/12/2023	Computer Search (Other)	9.36
08/13/2023	Computer Search (Other)	3.96
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; OFFICER MANAGING GEN; HCHK Technologies, Inc.; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630193237054 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Sari B. Placona, Esq; HCHK Entities; 75 Livingston Avenue, 2nd Floor; Roseland, NJ 070683737 ; 1ZA6T1630196497107 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Priya Chaudhry; Yanping "Yvette" Wang; 147 W. 25th St. 12th Fl; New York, NY 100017229 ; 1ZA6T1630199275930 (MAN)	24.19

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Officer, Managing o; HCHK Property Management, Inc.; 1209 Orange Street; Wilmington, DE 198011120 ; 1ZA6T1630190595244 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Alex Lipman; Yanping "Yvette" Wang; 147 W. 25th St. 12th Fl; New York, NY 100017229 ; 1ZA6T1630199936529 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Brian W. Hofmeister; Assignee for the Benefit Creditors; 3131 Princeton Pike; Lawrenceville, NJ 086482201 ; 1ZA6T1630197216882 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Jeremy H. Temkin; c/o Morvillo Abramowitz; 565 Fifth Avenue; New York, NY 100172413 ; 1ZA6T1630190698884 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Ryan T. Jareck. Esq.; Assignee for the Benefit Creditors; 1325 Avenue of the Americas; New York, NY 100196026 ; 1ZA6T1630196669092 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; OFFICER MANAGING GEN; Lexington Property and Staffing, In; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630190904267 (MAN)	24.19
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Taurus Management LLC; 6628 Sky Pointe Dr; Las Vegas, NV 891314076 ; 1ZA6T1630198129984 (MAN)	25.08
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Taurus Fund LLC; 6628 Sky Pointe Dr. Ste 129; Las Vegas, NV 891314076 ; 1ZA6T1630195791577 (MAN)	25.08

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Scott Barnett; 6628 Sky Pointe Dr; Las Vegas, NV 891314076 ; 1ZA6T1630195520190 (MAN)	25.08
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Taurus Management LLC; 110 E. Broadway St.; Hobbs, NM 882408424 ; 1ZA6T1630191856924 (MAN)	28.53
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630190149931 (MAN)	31.05
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; ; Joshua I. Sherman, Esq.; 10 Mohawk Drive; Livingston, NJ 070393112 ; 1ZA6T1630192218291 (MAN)	31.05
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Anthony DiBattista; Lexington Property and Staffing, In; 45 Park Hill Dr.; Hopewell Junction, NY 125335607 ; 1ZA6T1630192632879 (MAN)	37.56
08/14/2023	Postage/Express Mail - First Class - US;	10.39
08/14/2023	Postage/Express Mail - First Class - US;	16.54
08/14/2023	Postage/Express Mail - First Class - US;	224.40
08/14/2023	Postage/Express Mail - First Class - US;	66.96
08/14/2023	Computer Search (Other)	28.44
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; OFFICER MANAGING GEN; Lexington Property and Staffing, In; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630194610022 (MAN)	24.19

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; OFFICER MANAGING GEN; HCHK Technologies, Inc.; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630198223087 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; Jeremy H. Temkin; Anthony DiBattista; c/o Morvillo Abramowitz Grand Iason; New York, NY 10017 ; 1ZA6T1630193497443 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; ; HCHK Property Management, Inc.; 1209 Orange Street; WILMINGTON, DE 198011120 ; 1ZA6T1630196586672 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; ; Yanping "Yvette" Wang; c/o ChaudhryLaw PLLC; New York, NY 100017229 ; 1ZA6T1630192057036 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; Sari B. Placona, Esq; HCHK Entities; 75 Livingston Avenue, 2nd Floor; Roseland, NJ 070683737 ; 1ZA6T1630194440411 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; Alex Lipman; Yanping "Yvette" Wang; c/o Lipman Law PLLC; New York, NY 100017229 ; 1ZA6T1630199951299 (MAN)	24.19
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; Emil Bove; Yanping "Yvette" Wang; c/o Chiesa Shiniian & Giantomasi P.C; New York, NY 100366600 ; 1ZA6T1630198535302 (MAN)	24.19

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08/15/2023	Local - Meals - Ezra Sutton; 08/02/2023; Restaurant: Eden Work; City: Midtown East ; Dinner; Number of people: 1; Working late on Kwok matter	33.74
08/15/2023	Postage/Express Mail - First Class - US;	12.15
08/15/2023	Postage/Express Mail - International;	3.00
08/15/2023	Computer Search (Other)	47.43
08/16/2023	Computer Search (Other)	9.54
08/17/2023	Computer Search (Other)	18.63
08/18/2023	Computer Search (Other)	19.53
08/21/2023	Computer Search (Other)	11.70
08/22/2023	Computer Search (Other)	21.24
08/23/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/23/2023; John Frederick O'Con; Steptoe & Johnson LLP; 1330 Connecticut Avenue, N.W.; Washington, DC 200361704 ; 1ZA6T1632495561684 (MAN)	31.76
08/23/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/23/2023; Michael P. Thompson; Gordon & Rees Scully Mansukhani LLP; 95 Glastonbury Boulevard, Suite 206; Glastonbury, CT 060334412 ; 1ZA6T163A292115997 (MAN)	33.29
08/23/2023	Postage/Express Mail - First Class - US;	10.20
08/23/2023	Postage/Express Mail - First Class - US;	10.65
08/23/2023	Postage/Express Mail - First Class - US;	149.60
08/23/2023	Postage/Express Mail - International;	16.54
08/23/2023	Postage/Express Mail - First Class - US;	20.90
08/23/2023	Postage/Express Mail - First Class - US;	37.65
08/23/2023	Postage/Express Mail - First Class - US;	6.06
08/23/2023	Postage/Express Mail - First Class - US;	9.55
08/23/2023	Computer Search (Other)	26.82

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; OFFICER MANAGING GEN; Lexington Property and Staffing, In; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1630190601727 (MAN)	24.29
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; Michael P. Thompson; Gordon & Rees Scully Mansukhani LLP; 95 Glastonbury Boulevard, Suite 206; Glastonbury, CT 060334412 ; 1ZA6T1630199397764 (MAN)	24.29
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; John Frederick O'Con; Steptoe & Johnson LLP; 1330 Connecticut Avenue, N.W.; Washington, DC 200361704 ; 1ZA6T1630193597853 (MAN)	24.29
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Priya Chaudhry; Yanping "Yvette" Wang; 147 W. 25th St. 12th Fl; New York, NY 100017229 ; 1ZA6T1632494072955 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Officer, Managing or; HCHK Property Management, Inc.; 1209 Orange Street; Wilmington, DE 198011120 ; 1ZA6T1632493274113 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Sari B. Placona, Esq; HCHK Entities; 75 Livingston Avenue, 2nd Floor; Roseland, NJ 070683737 ; 1ZA6T1632494267905 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Jeremy H. Temkin; Anthony DiBattista; 565 Fifth Ave; New York, NY 100172413 ; 1ZA6T1632491846160 (MAN)	31.76

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08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; ; BRIAN W. HOFMEISTER; 3131 PRINCETON PIKE; LAWRENCEVILLE, NJ 086482201 ; 1ZA6T1632499288811 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Ryan T. Jareck. Esq.; Assignee for the Benefit Creditors; 1325 Avenue of the Americas; New York, NY 100196026 ; 1ZA6T1632490720770 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Alex Lipman; Yanping "Yvette" Wang; c/o Lipman Law PLLC; New York, NY 100017229 ; 1ZA6T1632497039003 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; OFFICER MANAGING GEN; HCHK Technologies, Inc.; 251 Little Falls Drive; WILMINGTON, DE 198081674 ; 1ZA6T1632491926734 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; Emil Bove; Yanping "Yvette" Wang; c/o Chiesa Shinian & Giantomasi P.C; New York, NY 100366600 ; 1ZA6T1632493765146 (MAN)	31.76
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/24/2023; ; ANTHONY DIBATTISTA; 45 Park Hill Dr.; HOPEWELL JUNCTION, NY 125335607 ; 1ZA6T1632496162425 (MAN)	45.19
08/24/2023	Postage/Express Mail - First Class - US;	19.08
08/24/2023	Postage/Express Mail - International;	4.17
08/24/2023	Postage/Express Mail - First Class - US;	6.06
08/24/2023	Computer Search (Other)	88.29
08/25/2023	Postage/Express Mail - Express Mail;	28.75
08/25/2023	Postage/Express Mail - International;	4.17

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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08/25/2023	Computer Search (Other)	120.42
08/27/2023	Computer Search (Other)	16.29
08/28/2023	Computer Search (Other)	10.89
08/29/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/29/2023; Michael P. Thompson; Gordon & Rees Scully Mansukhani LLP; 95 Glastonbury Boulevard, Suite 206; Glastonbury, CT 060334412 ; 1ZA6T1630196305153 (MAN)	24.29
08/29/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/29/2023; John Frederick O'Co; Steptoe & Johnson LLP; 1330 Connecticut Avenue, N.W.; Washington, DC 200361704 ; 1ZA6T1630195531964 (MAN)	24.29
08/29/2023	Postage/Express Mail - First Class - US;	2.70
08/29/2023	Postage/Express Mail - First Class - US;	33.75
08/29/2023	Computer Search (Other)	18.27
08/30/2023	Computer Search (Other)	62.82
08/31/2023	Lexis/On Line Search - Courtlink Use - Charges for August 2023	13.25
08/31/2023	Computer Search (Other)	16.65
Total Costs incurred and advanced		\$5,583.36

Current Fees and Costs	\$238,574.86
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Total Balance Due - Due Upon Receipt	\$238,574.86
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PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371609

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Asset Recovery Investigation and Litigation

PH LLP Client/Matter # 50687-00002

Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$423,272.75
Costs incurred and advanced	17,235.06
Current Fees and Costs Due	\$440,507.81
Total Balance Due - Due Upon Receipt	\$440,507.81

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
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PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371609

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Asset Recovery Investigation and Litigation

PH LLP Client/Matter # 50687-00002
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$423,272.75
Costs incurred and advanced	17,235.06
Current Fees and Costs Due	\$440,507.81
Total Balance Due - Due Upon Receipt	\$440,507.81

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371609

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending August 31, 2023

Asset Recovery Investigation and Litigation

\$423,272.75

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B113 Pleadings Review					
08/04/2023	DEB4	Review G. Muse litigation filings	0.30	1,320.00	396.00
08/16/2023	ECS1	Review court filings in connection with various adversary proceedings	0.20	1,015.00	203.00
Subtotal: B113 Pleadings Review			0.50		599.00
B120 Asset Analysis and Recovery					
08/01/2023	LAD4	Review/edit letter to Lalive (Swiss firm) re: Ace Decade	0.40	1,860.00	744.00
08/17/2023	LAD4	Review/edit letter to Harcus Parker re: stay of Ace Decade proceeding	0.20	1,860.00	372.00
Subtotal: B120 Asset Analysis and Recovery			0.60		1,116.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
08/11/2023	ECS1	Review submissions set for hearing on August 14-15	0.40	1,015.00	406.00
08/13/2023	ECS1	Prepare documents and caselaw for August 14-15 hearings in the case	0.30	1,015.00	304.50
08/14/2023	DEB4	Conference with E. Sutton regarding next day's hearing, agenda for same, and hearing documents (0.2); follow up correspondence with E. Sutton regarding same (0.1)	0.30	1,320.00	396.00
08/14/2023	ECS1	Correspond with A. Luft and W. Farmer regarding agenda and talking points for 8/15/23 hearing (.4); call with D. Barron regarding same (.2)	0.60	1,015.00	609.00
08/14/2023	ECS1	Prepare agenda for August 15 hearings in the case	0.10	1,015.00	101.50
08/15/2023	ECS1	Review submissions and prepare hearing notes for 8/15/23 Kwok case hearing	0.20	1,015.00	203.00
08/17/2023	ECS1	Review matters set for 8/22/23 hearing in the case	0.20	1,015.00	203.00
08/18/2023	ECS1	Review submissions and prepare caselaw for 8/22/23 hearing	0.30	1,015.00	304.50
08/20/2023	ECS1	Correspond with L. Despins regarding 8/22/23 hearing	0.10	1,015.00	101.50
08/20/2023	ECS1	Continue to review submissions and prepare caselaw for 8/22/23 hearing	0.20	1,015.00	203.00
08/21/2023	ECS1	Continue to review submissions and prepare caselaw for 8/22/23 hearing	0.20	1,015.00	203.00
08/22/2023	ECS1	Review submissions and prepare documents for 8/22/23 Kwok case hearing	1.50	1,015.00	1,522.50
08/22/2023	LAD4	Review submissions and prepare outline for Hudson Diamond hearing (.30); handle Hudson Diamond hearing (4.10); post-mortem call N. Bassett re: same (.30)	4.70	1,860.00	8,742.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023		Attend hearing on Trustee's second omnibus motion to compel compliance with Rule 2004 subpoenas (4.1); prepare summary notes regarding same (.2)	4.30	815.00	3,504.50
08/24/2023	ECS1	Correspond with D. Mohamed regarding agenda for 8/26/23 hearing in the Kwok case	0.10	1,015.00	101.50
08/27/2023	ECS1	Correspond with D. Mohamed regarding agenda for 8/29/23 hearing in the Kwok case (.2); review draft agenda for 8/29/23 hearing (.2)	0.40	1,015.00	406.00
08/28/2023	DM26	Prepare reference materials for 8/29/23 hearing	2.20	540.00	1,188.00
08/28/2023	ECS1	Correspond with D. Mohamed regarding reference materials for 8/29/23 hearing (.6); review same (.2)	0.80	1,015.00	812.00
08/28/2023	LAD4	T/c P. Linsey (NPM) re: prepare for 8/29 hearing	0.40	1,860.00	744.00
Subtotal: B155 Court Hearings			17.30		20,055.50

B191 General Litigation

08/01/2023	ECS1	Call with W. Farmer, , and P. Linsey (NPM) regarding adversary proceeding and appeal filing dates and deadlines	0.40	1,015.00	406.00
08/01/2023	AEL2	Call with N. Bassett re: open litigation and investigation items and plan for same (.3); prepare outline regarding same (.2)	0.50	1,625.00	812.50
08/01/2023		Conference with W. Farmer, E. Sutton and P. Linsey (NPM) regarding pending and upcoming matters and related dates and deadlines (.4); update issues/task list following same (.1)	0.50	815.00	407.50
08/01/2023	NAB	Call with A. Luft regarding litigation issues and workstreams	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023	WCF	Call with P. Linsey (NPM), _____, E. Sutton regarding appeals and adversary proceeding filing dates and deadlines	0.40	1,235.00	494.00
08/02/2023	ECS1	Correspond with L. Despins regarding Rule 8004	0.10	1,015.00	101.50
08/04/2023	ECS1	Correspond with J. Kosciwicz regarding open case issues	0.10	1,015.00	101.50
08/04/2023	JK21	Update appeal tracking chart	0.40	540.00	216.00
08/04/2023	AEL2	Discuss and update issues/task list for pending investigations and adversary proceedings with W. Farmer and N. Bassett (1.1); prepare follow up notes regarding same (.1)	1.20	1,625.00	1,950.00
08/04/2023	AEL2	Correspond with N. Bassett re: issues/task list and case strategy	0.90	1,625.00	1,462.50
08/04/2023	NAB	Call with W. Farmer and A. Luft regarding pending and upcoming litigation and strategy for same (1.1); review issues/task list in connection with same (.1)	1.20	1,625.00	1,950.00
08/04/2023	WCF	Call with A. Luft and N. Bassett regarding open issues/tasks in pending adversary proceedings and appeal	1.10	1,235.00	1,358.50
08/07/2023	JPK1	Attend teleconference with W. Farmer, _____, and P. Linsey regarding adversary proceeding and discovery deadlines	0.50	915.00	457.50
08/07/2023		Prepare updated litigation issues/task list	0.30	815.00	244.50
08/07/2023		Conference with P. Linsey, W. Farmer, J. Kosciwicz on litigation issues/task list	0.50	815.00	407.50
08/07/2023	WCF	Call with _____, P. Linsey (NPM), J. Kosciwicz regarding adversary proceeding and appeal work streams	0.50	1,235.00	617.50
08/09/2023	NAB	Correspond with W. Farmer regarding preliminary injunction hearing (.2); prepare hearing notes for same (.4)	0.60	1,625.00	975.00
08/10/2023	JK21	Update appeal tracking chart	1.80	540.00	972.00
08/15/2023	JK21	Update appeals tracking chart	0.40	540.00	216.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2023	NAB	Correspond with A. Luft regarding general case strategy and developments (.4); correspond with W. Farmer regarding same (.1)	0.50	1,625.00	812.50
08/17/2023		Update litigation issues/task list	0.80	815.00	652.00
08/18/2023	DEB4	Call with W. Farmer, E. Sutton, A. Luft, S. Maza, and J. Kosciwicz regarding litigation issues/tasks	1.20	1,320.00	1,584.00
08/18/2023	JPK1	Attend meeting with A. Luft, W. Farmer, S. Maza, D. Barron, and E. Sutton regarding issues/task list for upcoming litigation matters	1.20	915.00	1,098.00
08/18/2023		Call with A. Luft, S. Maza, D. Barron, W. Farmer, E. Sutton and J. Kosciwicz regarding pending and upcoming litigation matters and related issues/task list (1.2); prepare follow up notes regarding same (.1)	1.30	815.00	1,059.50
08/18/2023	SM29	Call with A. Luft, W. Farmer, D. Barron, E. Sutton, J. Kosciwicz re upcoming matters and related issues/task list	1.20	1,320.00	1,584.00
08/18/2023	WCF	Call with A. Luft, S. Maza, D. Barron, E. Sutton, and J. Kosciwicz regarding pending and upcoming litigation matters and plan for same (1.2); review appendix and designation of record regarding Rule 2004 sanctions appellate brief (.2)	1.40	1,235.00	1,729.00
08/20/2023	NAB	Review litigation issues/task list and upcoming deadlines (.4); review documents and supplement outline for Greenwich Land depositions (.8); correspond with P. Linsey (NPM) regarding appellate deadlines (.2)	1.40	1,625.00	2,275.00
08/21/2023	ECS1	Call with W. Farmer, J. Kosciwicz, and P. Linsey (NPM) regarding adversary proceeding and appeal issues/tasks/deadlines	0.10	1,015.00	101.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/21/2023	JPK1	Attend meeting with E. Sutton, W. Farmer, and P. Linsey regarding issues/task list in adversary proceedings	0.10	915.00	91.50
08/21/2023	AEL2	Call with N. Bassett re: strategy and plan for ongoing work across pending investigations and adversary proceedings (.8); update issues/task list regarding same (.3)	1.10	1,625.00	1,787.50
08/21/2023	NAB	Correspond with W. Farmer regarding litigation and appellate scheduling issues and strategy (.3); review dates, deadlines, and scheduling orders in connection with same (.3); call with A. Luft regarding litigation issues/tasks, deadlines, and upcoming depositions (.8)	1.40	1,625.00	2,275.00
08/21/2023	WCF	Call with E. Sutton, J. Kosciwicz, and P. Linsey regarding issues/tasks in pending adversary proceedings (.1)	0.10	1,235.00	123.50
08/22/2023	JK21	Update appeals tracking chart	0.40	540.00	216.00
08/23/2023	ECS1	Correspond with L. Despins regarding upcoming deadlines in the Kwok case (.1); review pleadings in connection with same (.1); review transcripts from hearings in the HCHK adversary proceeding (.1)	0.30	1,015.00	304.50
08/23/2023	JK21	Update appeals tracking chart	0.60	540.00	324.00
08/26/2023	NAB	Review litigation deadlines and next steps	0.50	1,625.00	812.50
08/29/2023	JK21	Update appeals tracking chart	0.30	540.00	162.00
08/31/2023	JK21	Update appeals tracking chart	0.30	540.00	162.00
Subtotal: B191 General Litigation			25.90		30,791.50

B195 Non-Working Travel

08/22/2023	AEL2	Travel back to NY from Court in CT after hearing (Bill at 1/2 rate)	2.20	812.50	1,787.50
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023		Train ride from Grand Central, NY to Bridgeport, CT and back to New York from Bridgeport, CT for Mei Guo's cross examination in Hudson Diamond contempt hearing (Bill at 1/2 rate)	3.50	407.50	1,426.25
Subtotal: B195 Non-Working Travel			5.70		3,213.75

B210 Business Operations

08/04/2023	AB21	Review Yachtzoo invoice	0.10	1,625.00	162.50
08/08/2023	AB21	Analyze Yachtzoo invoice (0.4); call with E. Ganic (Yachtzoo) regarding same (0.4)	0.80	1,625.00	1,300.00
08/30/2023	AB21	Correspond with R. Stockil (Yachtzoo) regarding open issues with respect to Lady May and Lady May 2	0.10	1,625.00	162.50
08/31/2023	AB21	Correspond with T. Sadler regarding invoice related to Lady May 2	0.10	1,625.00	162.50
Subtotal: B210 Business Operations			1.10		1,787.50

B261 Investigations

08/01/2023	DM26	Prepare for upcoming deposition of BakerHostetler and send calendar reminder (.3); email E. Sutton re: same (.1)	0.40	540.00	216.00
08/01/2023	DEB4	Calls with E. Sutton regarding next rule 2004 motion and Kroll documents	0.20	1,320.00	264.00
08/01/2023	DEB4	Correspond with L. Despins regarding presentation for Kroll	0.10	1,320.00	132.00
08/01/2023	ECS1	Prepare chart and executive summary of bank accounts and statements produced in Kwok discovery for forensic accountant (1.5); calls with D. Barron about the same (.2); correspond with L. Despins, N. Bassett, A. Luft and D. Barron about same (.1)	1.80	1,015.00	1,827.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023	ECS1	Review and summarize documents produced in response to rule 2004 requests (.2); review Sherry Netherland closing documents (.2); correspond with A. Bongartz regarding same (.1)	0.50	1,015.00	507.50
08/01/2023	ECS1	Review and supplement topics for BakerHostetler depositions (.2); correspond with W. Farmer, N. Bassett regarding same (.1)	0.30	1,015.00	304.50
08/01/2023	AE12	Revise sixth motion for rule 2004 discovery	0.60	1,625.00	975.00
08/01/2023	AE12	Correspond with L. Despina re: Baker Hostetler deposition topics	0.10	1,625.00	162.50
08/01/2023	NAB	Review emails from tipsters regarding investigation items (.2); correspond with W. Farmer regarding Rule 2004 deposition of BakerHostetler (.2)	0.40	1,625.00	650.00
08/01/2023	WCF	Correspond with E. Sutton and N. Bassett regarding Rule 2004 deposition of BakerHostetler	0.20	1,235.00	247.00
08/02/2023	DM26	Research information regarding individual targets included in supplemental rule 2004 motion (1.7); prepare forensic accountant documents for Kroll (.8)	2.50	540.00	1,350.00
08/02/2023	DEB4	Prepare presentation for Kroll regarding forensic investigation (6.7); conference with A. Luft regarding same (0.6); correspond with L. Despina regarding meeting with Kroll (0.1); correspond with A. Pfeiffer (Kroll) regarding same (0.1); correspond with L. Despina regarding findings in FARA decision (0.2)	7.70	1,320.00	10,164.00
08/02/2023	ECS1	Prepare parts of presentation for Kroll as forensic accountants (.9); correspond with D. Barron regarding same (.2)	1.10	1,015.00	1,116.50
08/02/2023	ECS1	Review and summarize documents produced in response to rule 2004 motions	0.60	1,015.00	609.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	ECS1	Further prepare presentation for meeting with Kroll as forensic accountants (.3); correspond with D. Barron regarding same (.1)	0.40	1,015.00	406.00
08/02/2023	ECS1	Prepare sixth supplemental rule 2004 motion (2.2); correspond with D. Barron regarding same (.2); correspond with D. Mohamed about same (.2)	2.60	1,015.00	2,639.00
08/02/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.20	1,015.00	203.00
08/02/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.30	1,015.00	304.50
08/02/2023	LAD4	Review/edit charts for Kroll meeting	1.30	1,860.00	2,418.00
08/02/2023	AEL2	Meeting with D. Barron re: priority topics for Kroll investigation	0.60	1,625.00	975.00
08/02/2023	AEL2	Consider priority topics and prepare notes regarding same for meeting with Kroll	0.90	1,625.00	1,462.50
08/02/2023	AEL2	Correspond with J. Kosciwicz re: GTV/Saraca sanctions brief	0.30	1,625.00	487.50
08/02/2023	NAB	Prepare outline for meeting with Kroll regarding investigation (.1); correspond with A. Luft regarding same (.1)	0.20	1,625.00	325.00
08/03/2023	DM26	Research information regarding additional targets included in the sixth supplemental rule 2004 motion	4.80	540.00	2,592.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2023	DEB4	Analyze produced documents in connection with meeting with Kroll (1.7); conference with L. Despins and A. Luft regarding meeting with Kroll (0.4); attend meeting with Kroll, L. Despins, A. Luft regarding forensic analysis (2.8); correspond with S. Phan (UnitedLex) regarding data/documents for Kroll (0.1); conference with E. Sutton regarding additional documents for Kroll (0.1); prepare email to Kroll regarding care packages (0.2); analyze certain documents for same (0.8)	6.10	1,320.00	8,052.00
08/03/2023	DEB4	Correspond with P. Parizek (Kroll) regarding forensic investigation documents (0.1); correspond with regarding same (0.1)	0.20	1,320.00	264.00
08/03/2023	ECS1	Review and summarize documents produced in response to rule 2004 motions	0.30	1,015.00	304.50
08/03/2023	ECS1	Review and comment on presentation for Kroll as forensic accountants (.8); call with D. Barron regarding same (.1)	0.90	1,015.00	913.50
08/03/2023	ECS1	Prepare care package of key documents for Kroll as forensic accountant	0.20	1,015.00	203.00
08/03/2023	JPK1	Draft parts of supplemental motion to hold GTV Media and Saraca Media in civil contempt for failing to respond to Rule 2004 subpoenas (3.1); review July 18, 2023 hearing transcript regarding the same (.9)	4.00	915.00	3,660.00
08/03/2023	LAD4	Review/outline priority items for Kroll meeting (.90); Kroll meeting prep with A. Luft, D. Barron (.40); handle meeting with Kroll, A. Luft, D. Barron re: same (2.80); review/edit list of immediate action items for Kroll (1.50)	5.60	1,860.00	10,416.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2023	AEI2	Prepare for meeting with Kroll with L. Despins and D. Barron (.4); participate in kick off meeting with Kroll, L. Despins, N. Bassett, D. Barron regarding forensic investigation (2.8); prepare action items for Kroll (.3)	3.50	1,625.00	5,687.50
08/04/2023	DEB4	Correspond with regarding investigation target information for Kroll (0.2); analyze documents related to same (0.2); correspond with P. Parizek (Kroll) regarding same (0.1)	0.50	1,320.00	660.00
08/04/2023	ECS1	Review status of G Music's document production	0.10	1,015.00	101.50
08/04/2023	ECS1	Review next steps under order to show cause re GTV and Saraca and contempt	0.20	1,015.00	203.00
08/04/2023		Prepare summary of informant's email on GMusic, HCHK and Kwok-related activities	1.60	815.00	1,304.00
08/05/2023	JPK1	Continue drafting supplemental motion to hold GTV Media and Saraca Media in civil contempt for failing to respond to rule 2004 subpoenas	2.70	915.00	2,470.50
08/06/2023	DEB4	Correspond with E. Esses (Kroll) regarding database documents for forensic analysis (0.1); correspond with S. Phan (Unitedlex) regarding same (0.1)	0.20	1,320.00	264.00
08/06/2023	NAB	Correspond with W. Farmer regarding BakerHostetler rule 2004 deposition (.4); analyze topics for same (.3)	0.70	1,625.00	1,137.50
08/06/2023	WCF	Analyze BakerHostetler Rule 2004 documents regarding relevance to August 10, 2023 deposition	1.90	1,235.00	2,346.50
08/07/2023	DEB4	Conference with A. Pfeiffer (Kroll) regarding next steps in forensic investigation	0.20	1,320.00	264.00
08/07/2023	DEB4	Conference with W. Farmer regarding forensic analysis and related document review	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023		Correspond with TSG regarding deposition with BakerHostetler	0.60	815.00	489.00
08/07/2023		Review docket sheets in cases where Kwok is represented by BakerHostetler	0.60	815.00	489.00
08/07/2023	NAB	Correspond with W. Farmer regarding rule 2004 deposition issues (.2); review documents for BakerHostetler deposition (1.1); analyze topics and related case law in preparation for deposition (.6)	1.90	1,625.00	3,087.50
08/07/2023	WCF	Draft outline of BakerHostetler Rule 2004 deposition (4.2); call with D. Barron regarding forensic accountant and next steps in analysis (.1)	4.30	1,235.00	5,310.50
08/07/2023	WCF	Review libel and non-bankruptcy litigation filings involving the Debtor for use in BakerHostetler deposition	2.40	1,235.00	2,964.00
08/08/2023	DEB4	Correspond with P. Parizek (Kroll) regarding Relativity data and documents for forensic analysis	0.10	1,320.00	132.00
08/08/2023	DEB4	Correspond with P. Parizek (Kroll) regarding key documents for forensic review	0.30	1,320.00	396.00
08/08/2023	DEB4	Correspond with W. Farmer regarding Aaron Mitchell documents	0.20	1,320.00	264.00
08/08/2023	DEB4	Correspond with S. Shukla (UnitedLex) regarding Relativity data and documents	0.10	1,320.00	132.00
08/08/2023	DEB4	Conference with P. Parizek (Kroll), L. Despins and A. Luft regarding forensic investigation (.5); prepare follow up notes regarding next steps (.2)	0.70	1,320.00	924.00
08/08/2023	DEB4	Conference with E. Esses (Kroll) and W. Farmer regarding Relativity issues and document search	0.50	1,320.00	660.00
08/08/2023	JPK1	Draft preliminary statement for supplemental motion to hold GTV Media and Saraca Media in civil contempt for failing to respond to Rule 2004 subpoenas (1.2); review and revise related brief (1.0)	2.20	915.00	2,013.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/08/2023	LAD4	T/c with Kroll (A. Pfeiffer), D. Barron, A. Luft re: next steps in Kroll analysis	0.50	1,860.00	930.00
08/08/2023	AEL2	Meeting with Kroll, D. Barron, L. Despins re: scope of work	0.50	1,625.00	812.50
08/08/2023	AEL2	Call with G. Leibowitz re: Casper retainer discussion	0.40	1,625.00	650.00
08/08/2023	NAB	Correspond with W. Farmer regarding BakerHostetler deposition (.5); review discovery documents and prepare parts of outline re same (1.9)	2.40	1,625.00	3,900.00
08/08/2023	WCF	Call with D. Barron and Kroll (forensic accountants) regarding financial document analysis (.5); analyze targeted searches regarding BakerHostetler deposition issues (3.3); draft parts of BakerHostetler rule 2004 deposition outline (1.2)	5.00	1,235.00	6,175.00
08/09/2023	DEB4	Conference with P. Linsey (NPM) regarding bank discovery	0.40	1,320.00	528.00
08/09/2023	DEB4	Correspond with A. Luft regarding supplemental rule 2004 motion	0.10	1,320.00	132.00
08/09/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding glossary and certain data/documents for review	0.20	1,320.00	264.00
08/09/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding certain documents from production	0.30	1,320.00	396.00
08/09/2023	DEB4	Correspond with J. Kosciwicz regarding documents for Kroll's analysis	0.30	1,320.00	396.00
08/09/2023	DEB4	Conference with J. Lazarus regarding bank statements	0.10	1,320.00	132.00
08/09/2023	LAD4	Analyze/comment on civil RICO issues	2.90	1,860.00	5,394.00
08/09/2023	AEL2	Revise draft supplemental contempt motion	1.10	1,625.00	1,787.50
08/09/2023	AEL2	Revise BakerHostetler deposition outline	0.90	1,625.00	1,462.50
08/09/2023	AEL2	Draft settlement proposal to the Casper firm counsel	0.70	1,625.00	1,137.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/09/2023	AEI2	Call with W. Farmer regarding BakerHostetler rule 2004 deposition outline	0.30	1,625.00	487.50
08/09/2023	WCF	Correspond with N. Bassett regarding BakerHostetler deposition outline (.2); second-level review and targeted search of documents for incorporation in BakerHostetler Rule 2004 deposition (3.7); correspond with UnitedLex regarding G Club document review (.1); call with A. Luft regarding BakerHostetler deposition outline (.3); continue to prepare rule 2004 deposition outline for BakerHostetler (1.6); prepare deposition exhibit rider (1.2)	7.10	1,235.00	8,768.50
08/10/2023	AB21	Correspond with D. Barron regarding BVI discovery	0.30	1,625.00	487.50
08/10/2023	DM26	Research regarding information on targets included in sixth supplemental rule 2004 motion	0.70	540.00	378.00
08/10/2023	DM26	Correspond with J. Kosciwicz regarding draft supplemental contempt motion regarding GTV Media and Saraca Media	0.20	540.00	108.00
08/10/2023	DEB4	Conference with L. Despins, A. Luft, A. Pfeiffer (Kroll) and P. Parizek (Kroll) regarding plan and strategy for forensic analysis	0.70	1,320.00	924.00
08/10/2023	DEB4	Correspond with E. Sutton regarding additional rule 2004 target	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with L. Despins regarding Brown Rudnick production (0.1); correspond with A. Luft and N. Bassett regarding same (0.1)	0.20	1,320.00	264.00
08/10/2023	DEB4	Correspond with E. Sutton regarding revisions to supplemental rule 2004 motion	0.30	1,320.00	396.00
08/10/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.30	1,015.00	304.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/2023	ECS1	Prepare sixth supplemental rule 2004 motion (4.2); correspond with D. Barron regarding same (.2); correspond with D. Mohamed about same (.2); correspond with P. Linsey (NPM) regarding same (.3)	4.90	1,015.00	4,973.50
08/10/2023	JPK1	Correspond with D. Mohamed regarding authority supporting supplemental motion to hold GTV Media and Saraca Media in civil contempt	0.20	915.00	183.00
08/10/2023	JPK1	Draft parts of supplemental motion to hold GTV Media and Saraca Media in civil contempt	1.00	915.00	915.00
08/10/2023	LAD4	Weekly call with Kroll and D. Barron, A. Luft (.70); continue to review/edit Kroll task list (1.80)	2.50	1,860.00	4,650.00
08/10/2023	AE12	Revise GTV/Saraca Media sanctions brief	1.40	1,625.00	2,275.00
08/10/2023	AE12	Correspond with J. Kosciwicz re: comments on supplemental motion to hold GTV/Saraca in contempt	0.50	1,625.00	812.50
08/10/2023	AE12	Correspond with W. Farmer and N. Bassett re: BakerHostetler deposition	0.40	1,625.00	650.00
08/10/2023	AE12	Update call with L. Despins, D. Barron, A. Pfeiffer and P. Parizek at Kroll regarding forensic analysis	0.70	1,625.00	1,137.50
08/10/2023	NAB	Review documents and prepare parts of outline for BakerHostetler Rule 2004 deposition (1.9); correspond with W. Farmer regarding same (.2); take BakerHostetler deposition (3.5); follow-up correspondence with L. Despins regarding same (.1); call with S. Sarnoff (OMM) regarding same (.1)	5.80	1,625.00	9,425.00
08/10/2023	WCF	Review, revise BakerHostetler deposition documents (.8); supplement outline for BakerHostetler deposition (1.0); attend BakerHostetler Rule 2004 deposition (3.5)	5.30	1,235.00	6,545.50

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08/11/2023	DM26	Research SDNY District Court case no. 18cv2185 and related cases and pleadings for E. Sutton (.9); review authority cited in contempt motion regarding GTV Media and Saraca Media (1.3); prepare comments on same (.2)	2.40	540.00	1,296.00
08/11/2023	DM26	Research regarding registered agents and additional information for targets in supplemental rule 2004 motion	0.80	540.00	432.00
08/11/2023	DEB4	Correspond with P. Parizek (Kroll) on forensic research	0.10	1,320.00	132.00
08/11/2023	DEB4	Correspond with E. Sutton regarding interview outlines	0.10	1,320.00	132.00
08/11/2023	DEB4	Correspond with A. Pfeiffer (Kroll) regarding Kroll plan for forensic analysis	0.10	1,320.00	132.00
08/11/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.50	1,015.00	507.50
08/11/2023	ECS1	Prepare outline of questions for interview of Yossi Almani (1.3); correspond with A. Luft and P. Pillegi (counsel to Y. Almani) regarding same (.2)	1.50	1,015.00	1,522.50
08/11/2023	ECS1	Prepare annotated outline of data/document productions for Kroll (1.4); correspond with W. Farmer regarding same (.1)	1.50	1,015.00	1,522.50
08/11/2023	ECS1	Review and summarize documents produced in response to Rule 2004 requests	0.50	1,015.00	507.50
08/11/2023	ECS1	Prepare sixth supplemental rule 2004 motion (.3); correspond with P. Linsey (NPM) regarding same (.2); review and comment on service of same (.3)	0.80	1,015.00	812.00
08/11/2023	ECS1	Prepare email to Kroll regarding updates to document/data production database and additional financial documents	0.30	1,015.00	304.50

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08/11/2023	JK21	Electronically file with the court supplemental contempt motion against GTV and Saraca Media (0.4); review and comment on service of supplemental contempt motion against GTV and Saraca Media (0.2)	0.60	540.00	324.00
08/11/2023	JPK1	Correspond with J. Kuo regarding supplemental motion to hold GTV Media and Saraca Media in civil contempt	0.10	915.00	91.50
08/11/2023	JPK1	Revise supplemental motion to hold GTV Media and Saraca Media in civil contempt to incorporate comments from A. Luft	1.60	915.00	1,464.00
08/11/2023	JPK1	Correspond with D. Mohamed regarding authority related to supplemental motion to hold GTV Media and Saraca Media in civil contempt	0.10	915.00	91.50
08/11/2023	JPK1	Revise supplemental motion to hold GTV Media and Saraca Media in civil contempt to incorporate comments from L. Despins	0.30	915.00	274.50
08/11/2023	JPK1	Review edits from N. Bassett to supplemental motion to hold GTV Media and Saraca Media in civil contempt (.2); review and comment on revised brief (.7)	0.90	915.00	823.50
08/11/2023	JPK1	Prepare exhibits to supplemental motion to hold GTV Media and Saraca Media in civil contempt	0.20	915.00	183.00
08/11/2023	JPK1	Correspond with A. Luft regarding G Club brief	0.10	915.00	91.50
08/11/2023	JPK1	Correspond with A. Mitchell regarding supplemental motion to hold GTV Media and Saraca Media in civil contempt	0.10	915.00	91.50
08/11/2023	LAD4	Review/edit G Club privileged memo (1.20); review/edit sanction Saraca motion (1.40)	2.60	1,860.00	4,836.00
08/11/2023		Review and summarize informant's email on Zhen Cao and Min Tian	0.60	815.00	489.00
08/13/2023	DEB4	Correspond with L. Despins regarding rule 9019 motion	0.40	1,320.00	528.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/13/2023	ECS1	Prepare annotated outline of data/production documents in Relativity database for Kroll forensic review (.6); correspond with Kroll regarding same (.1)	0.70	1,015.00	710.50
08/14/2023	DEB4	Correspond with Kroll on plan for forensic review	1.00	1,320.00	1,320.00
08/14/2023	DEB4	Correspond with J. Barker (Kroll) regarding public data research	0.10	1,320.00	132.00
08/14/2023	ECS1	Review and comment on service of sixth supplemental rule 2004 motion	0.10	1,015.00	101.50
08/14/2023	ECS1	Correspond with W. Farmer regarding draft motions to compel	0.10	1,015.00	101.50
08/14/2023	ECS1	Prepare outline of questions for interview of Yossi Almani	0.10	1,015.00	101.50
08/14/2023	ECS1	Correspond with A. Luft, P. Linsey (NPM), and former HCHK attorney Joshua Sherman regarding the sixth omnibus rule 2004 motion	0.40	1,015.00	406.00
08/14/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.40	1,015.00	406.00
08/15/2023	DEB4	Correspond with J. Barker (Kroll) regarding case documents for forensic investigation	0.10	1,320.00	132.00
08/15/2023	DEB4	Conference with J. Barker (Kroll) regarding forensic investigation	0.40	1,320.00	528.00
08/15/2023	DEB4	Correspond with E. Esses (Kroll) regarding discovery database	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with A. Pfeiffer (Kroll) regarding forensic analysis work plan	0.20	1,320.00	264.00
08/15/2023	ECS1	Continue preparing outline of questions for interview of Yossi Almani	0.90	1,015.00	913.50
08/15/2023	ECS1	Prepare settlement agreement between the Trustee and the Casper firm	1.20	1,015.00	1,218.00
08/15/2023	ECS1	Review and summarize documents produced in response to discovery requests in the case	0.40	1,015.00	406.00

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08/15/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.60	1,015.00	609.00
08/15/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.40	1,015.00	406.00
08/15/2023	AEL2	Call with J. Sherman re: our rule 2004 request of him	0.70	1,625.00	1,137.50
08/15/2023	AEL2	Call with P. Linsey (NPM) re: J. Sherman request for extension of time to respond to rule 2004 request	0.20	1,625.00	325.00
08/15/2023	AEL2	Negotiate settlement with G. Leibowitz re: Casper Firm	0.70	1,625.00	1,137.50
08/15/2023		Review email from informant	0.20	815.00	163.00
08/16/2023	DEB4	Attend interview with Yossi Almani	1.00	1,320.00	1,320.00
08/16/2023	ECS1	Review certificate of service for sixth supplemental rule 2004 motion	0.10	1,015.00	101.50
08/16/2023	ECS1	Prepare list of potential targets (and descriptions) for the next Rule 2004 discovery motion	0.20	1,015.00	203.00
08/16/2023	ECS1	Review transcripts in connection with Zeisler and Zeisler and CSG's attempt to withdraw as counsel to Hudson Diamond	0.30	1,015.00	304.50
08/16/2023	ECS1	Review and summarize documents produced in response to case discovery	2.00	1,015.00	2,030.00
08/16/2023	ECS1	Prepare notes regarding Linwan Feng in advance of meet and confer with her counsel, Bruce Wisotsky (Norris McLaughlin) (.2); call with P. Linsey (NPM) regarding same (.1)	0.30	1,015.00	304.50
08/16/2023	ECS1	Prepare settlement agreement between the Trustee and the Casper firm (1.2); discussion with A. Luft regarding same (.1)	1.30	1,015.00	1,319.50
08/16/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and related corporate information	0.10	1,015.00	101.50

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08/16/2023	ECS1	Continue preparing questions for interview of Yossi Almani (1.5); review documents in connection with same (.2); correspond with D. Barron re same (.2); conduct Zoom interview of Yossi Almani together with A. Luft and D. Barron (1.0); prepare summary notes regarding same (.1)	3.00	1,015.00	3,045.00
08/16/2023	AEL2	Interview Y. Almani (1.0); analyze interview findings (.7)	1.70	1,625.00	2,762.50
08/16/2023	AEL2	Review J. Sherman objections re: rule 2004 investigation	0.30	1,625.00	487.50
08/16/2023	AEL2	Review and comment on draft settlement agreement with the Casper firm (.7); call with E. Sutton regarding same (.1)	0.80	1,625.00	1,300.00
08/16/2023	AEL2	Review documents and prepare questions for interview of Y. Almani	1.40	1,625.00	2,275.00
08/16/2023	AEL2	Correspond with P. Linsey (NPM) re: his meet and confer with J. Sherman	0.20	1,625.00	325.00
08/16/2023	WCF	Review latest Rule 2004 motion in advance of meet and confer calls (.3); call with counsel to G News and Irene Feng, and P. Linsey (NPM) regarding Rule 2004 discovery (.5); prepare notes for Ross Heinemeyer call (.2); attend rule 2004 call with Ross Heinemeyer regarding rule 2004 discovery and motion (.6)	1.60	1,235.00	1,976.00
08/17/2023	DEB4	Participate in Kroll call with L. Despins, A. Luft regarding forensic review update (1.5); conference with A. Lomas (Kroll) regarding financial documents (0.1); conference with P. Linsey regarding bank discovery (0.2); correspond with E. Sutton regarding document searches on bank accounts (0.2); correspond with P. Parizek (Kroll) regarding assets subject to forfeiture (0.1); correspond with E. Sutton regarding additional rule 2004 target (0.1)	2.20	1,320.00	2,904.00

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08/17/2023	DEB4	Correspond with L. Despins regarding Brown Rudnick production (0.1); correspond with E. Sutton regarding same (0.1); correspond with E. Sutton regarding Crane arbitration (0.1); correspond with P. Green (Divergent) regarding translator (0.1)	0.40	1,320.00	528.00
08/17/2023	DEB4	Correspond with W. Farmer regarding Greenwich Land transfers (0.3); correspond with L. Despins regarding deposition prep (0.1)	0.40	1,320.00	528.00
08/17/2023	DEB4	Conference with A. Luft regarding privilege issues	0.50	1,320.00	660.00
08/17/2023	ECS1	Prepare rule 9019 motion in connection with settlement agreement with the Casper firm	1.10	1,015.00	1,116.50
08/17/2023	ECS1	Analyze documents for Mei Guo's upcoming testimony in connection with Hudson Diamond's failure to produce documents and Zeisler's withdrawal as counsel to Hudson Diamond (1.8); incorporate documents into Mei Guo testimony outline (.6); correspond with D. Barron regarding same (.2); further correspond with A. Luft and D. Barron regarding same (.3)	2.90	1,015.00	2,943.50
08/17/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.40	1,015.00	406.00
08/17/2023	ECS1	Review Brown Rudnick production for information relating to its representation of the Debtor in connection with criminal matters (.9); prepare summary of same for D. Barron (.3)	1.20	1,015.00	1,218.00
08/17/2023	ECS1	Review and summarize documents produced in response to discovery requests (1.9); correspond with D. Barron regarding same (.1); further correspond with D. Barron and P. Linsey (NPM) regarding same (.3)	2.30	1,015.00	2,334.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.20	1,015.00	203.00
08/17/2023	JK21	Correspond with D. Barron regarding forfeiture bill of particulars in criminal case	0.20	540.00	108.00
08/17/2023	LAD4	Weekly call with Kroll, D. Barron, A. Luft re: forensic investigation	1.50	1,860.00	2,790.00
08/17/2023	AEL2	Meet with D. Barron re: privilege issues	0.50	1,625.00	812.50
08/17/2023	AEL2	Call with D. Stein re: foreign asset recovery	0.60	1,625.00	975.00
08/17/2023	AEL2	Prepare plan for M. Guo cross examination re: Hudson Diamond	0.80	1,625.00	1,300.00
08/17/2023	AEL2	Meeting with Kroll, L. Despins, and D. Barron regarding forensic investigation and analysis of intervenors' claims re: standing	1.50	1,625.00	2,437.50
08/17/2023	WCF	Review and revise appellate brief regarding contempt and discovery sanctions in main bankruptcy case against Mei Guo, HK USA, and counsel	1.10	1,235.00	1,358.50
08/18/2023	DEB4	Conference with E. Sutton regarding Mei Guo cross examination	0.10	1,320.00	132.00
08/18/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.20	1,015.00	203.00
08/18/2023	ECS1	Prepare parts of cross examination outline for Mei Guo in connection with 8/22/23 hearing (3.9); call with D. Barron regarding same (.1); correspond with D. Barron regarding same (.1)	4.10	1,015.00	4,161.50
08/18/2023	ECS1	Call with A. Luft, W. Farmer, S. Maza, D. Barron, , and J. Kosciwicz regarding upcoming hearings and discovery-related deadlines in the case (1.2); prepare notes regarding same (.4)	1.60	1,015.00	1,624.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	JPK1	Review court order on Trustee's supplemental motion to hold GTV Media and Saraca Media in contempt (.1); review registered agents for GTV Media and Saraca Media (.3); correspond with A. Mitchell regarding the same (.1); correspond with E. Cohan regarding the same (.2)	0.70	915.00	640.50
08/18/2023	AEL2	Meeting with S. Maza, D. Barron, E. Sutton, , W. Farmer and J. Kosciwicz re: outstanding discovery requests across adversary proceedings and rule 2004 motions	1.20	1,625.00	1,950.00
08/20/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding bank discovery (0.1); correspond with P. Linsey (NPM) regarding same (0.1)	0.20	1,320.00	264.00
08/21/2023	DEB4	Conference with A. Luft and regarding Mei Guo cross examination (2.9); analyze documents related to same (2.3); prepare exhibits and parts of outline in connection with same (6.3)	11.50	1,320.00	15,180.00
08/21/2023	ECS1	Analyze case law regarding a parent company's discovery obligations with respect to its subsidiaries (1.3); correspond with D. Barron re same (.1)	1.40	1,015.00	1,421.00
08/21/2023	ECS1	Prepare rule 9019 motion and accompanying motion to limit service in connection with settlement agreement with the Casper firm	1.00	1,015.00	1,015.00
08/21/2023	ECS1	Prepare parts of Mei Guo cross examination outline for 8/22/23 hearing (3.9); correspond with D. Barron regarding same (.4)	4.30	1,015.00	4,364.50
08/21/2023	JPK1	Draft certificates of service for order granting motion to hold GTV Media and Saraca Media in civil contempt (.4); correspond with E. Cohan regarding the same (.1)	0.50	915.00	457.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/21/2023	AEL2	Meet with D. Barron and re: M. Guo cross examination re: Hudson Diamond	2.90	1,625.00	4,712.50
08/21/2023	AEL2	Review documents and legal issues to prepare M. Guo cross examination (3.4); prepare parts of M. Guo cross examination (1.9)	5.30	1,625.00	8,612.50
08/21/2023	AEL2	Correspond with L. Despins re: questions for the Department of Justice	0.20	1,625.00	325.00
08/21/2023		Conference with A. Luft and D. Barron in preparation for Mei Guo cross examination in relation to Hudson Diamond Holding LLC	2.90	815.00	2,363.50
08/21/2023		Prepare parts of Mei Guo cross examination outline in connection with Hudson Diamond Holding LLC	1.00	815.00	815.00
08/21/2023	NAB	Review motion for leave to appeal Debtor's discovery sanctions order (.4); analyze authority relating to same (.8); correspond with P. Linsey (NPM) regarding same (.2); correspond with L. Despins regarding same (.1)	1.50	1,625.00	2,437.50
08/21/2023	WCF	Review and revise appellate brief regarding Rule 2004 contempt and sanctions against Mei Guo, HK USA, and L. Vartan (2.9); analyze appendix and evidence regarding same (2.2); draft appendix documents in support of appellate brief (2.7); correspond with P. Linsey regarding filing of appellate brief in district court (.2)	8.00	1,235.00	9,880.00
08/22/2023	DEB4	Conference with A. Luft regarding Hudson Diamond hearing takeaways	0.50	1,320.00	660.00
08/22/2023	DEB4	Prepare documents for Mei Guo cross examination	2.50	1,320.00	3,300.00
08/22/2023	DEB4	Correspond with P. Linsey (NPM) regarding bank discovery	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023	ECS1	Prepare responses to rule 2004 targets in connection with outstanding rule 2004 motions and subpoenas	0.90	1,015.00	913.50
08/22/2023	ECS1	Review authority regarding a parent company's discovery obligations with respect to its subsidiaries (.1); prepare cases and documents regarding same for A. Luft (.3)	0.40	1,015.00	406.00
08/22/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.40	1,015.00	406.00
08/22/2023	AEL2	Review documents and submissions to prepare M. Guo Hudson Diamond cross examination (1.5); prepare parts of M. Guo cross examination (2.6)	4.10	1,625.00	6,662.50
08/22/2023	AEL2	Call with D. Barron re: takeaways from Hudson Diamond hearing	0.50	1,625.00	812.50
08/22/2023	AEL2	Prepare parts of M. Guo cross examination outline (4.3); revise same (2.1)	6.40	1,625.00	10,400.00
08/22/2023		Review documents and supplement Mei Guo cross examination outline for Hudson Diamond Holding contempt hearing	6.80	815.00	5,542.00
08/22/2023	NAB	Call with L. Despins regarding Mei Guo testimony on Hudson Diamond motion to compel and additional issues (.3); call with L. Despins regarding Debtor's motion for leave to appeal discovery sanctions order (.2); analyze additional authority regarding same (.3); prepare draft response for same (2.1); correspond with P. Linsey (NPM) regarding same (.2); correspond with state court litigation counsel regarding update on bankruptcy (.1)	3.20	1,625.00	5,200.00
08/23/2023	DEB4	Correspond with P. Linsey (NPM) regarding bank discovery	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with E. Sutton regarding protective order	0.10	1,320.00	132.00

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08/23/2023	ECS1	Review and summarize documents produced in response to discovery requests	0.50	1,015.00	507.50
08/23/2023	ECS1	Prepare list of signatories to the protective order in the Kwok case (.4); review correspondence from P. Linsey in connection with same (.5); call and correspond with P. Linsey (NPM) regarding same (.2)	1.10	1,015.00	1,116.50
08/23/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.30	1,015.00	304.50
08/23/2023	ECS1	Review protective order in connection with Kroll's review of confidential documents (.4); correspond with D. Barron regarding same (.1)	0.50	1,015.00	507.50
08/23/2023	ECS1	Review Greenwich Land's objection to sixth supplemental rule 2004 motion (.2); prepare response same (.5); call with P. Linsey (NPM) regarding same (.1)	0.80	1,015.00	812.00
08/23/2023	JK21	Correspond with E. Sutton regarding cited cases in sixth omnibus rule 2004 examination motion	0.60	540.00	324.00
08/23/2023	JPK1	Correspond with E. Cohan regarding certificates of service for order holding GTV Media and Saraca Media in civil contempt	0.10	915.00	91.50
08/23/2023		Review exhibits for Mei Guo cross examination in connection with Hudson Diamond Holding contempt hearing	0.50	815.00	407.50
08/23/2023	NAB	Correspond with P. Linsey (NPM) regarding response to motion for leave to appeal (.2); final review of same (.2)	0.40	1,625.00	650.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	DEB4	Attend weekly call with Kroll and L. Despins regarding forensic investigation (1.5); conference with P. Linsey regarding Bento documents (0.3); correspond with N. Goradia (Kroll) and A. Luft regarding asset tracing (0.1); correspond with A. Luft and L. Despins regarding Bento documents (0.2); review same (0.3); conference with E. Sutton regarding same (0.3); conference with P. Linsey regarding bank discovery (0.2)	2.90	1,320.00	3,828.00
08/24/2023	ECS1	Correspond with P. Linsey (NPM) regarding deposition transcripts from the Kwok case	0.10	1,015.00	101.50
08/24/2023	ECS1	Correspond with A. Luft regarding settlement agreement between the Trustee and the Casper firm	0.10	1,015.00	101.50
08/24/2023	ECS1	Review and summarize documents produced in response to discovery requests in the case	0.50	1,015.00	507.50
08/24/2023	ECS1	Call with D. Barron regarding review of Bento production documents with Kroll	0.30	1,015.00	304.50
08/24/2023	JK21	Prepare exhibits for electronic filing in connection with Hudson Diamond Holding LLC civil contempt (0.6); electronically file with the court notice of filing exhibits in connection with Hudson Diamond Holding LLC civil contempt (0.3)	0.90	540.00	486.00
08/24/2023	JK21	Correspond with J. Kosciwicz regarding certificate of service of GTV Media and Saraca Media contempt order (0.2); electronically file with the court certificate of service of GTV Media and Saraca Media contempt order (0.2)	0.40	540.00	216.00
08/24/2023	JPK1	Prepare certificate of service for GTV Media and Saraca Media contempt order (.7); correspond with E. Sutton regarding the same (.1); correspond with E. Cohan regarding the same (.2)	1.00	915.00	915.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	JPK1	Correspond with J. Kuo regarding filing of certificate of service for GTV Media and Saraca Media contempt order	0.20	915.00	183.00
08/24/2023	LAD4	Handle portion of weekly Kroll call with D. Barron and Kroll (A. Pfeiffer, P. Parizek)	1.00	1,860.00	1,860.00
08/24/2023	AEL2	Call with P. Linsey re: proposed arguments in response to Greenwich Land's objection to rule 2004 discovery	0.50	1,625.00	812.50
08/24/2023	AEL2	Review weekly report from Kroll re: forensic investigation	1.30	1,625.00	2,112.50
08/24/2023	AEL2	Revise response to Greenwich Land's objection to rule 2004 discovery	1.20	1,625.00	1,950.00
08/24/2023	AEL2	Analyze Bento documents for follow up issues and requests	0.60	1,625.00	975.00
08/24/2023		Prepare exhibits to be filed in connection with the Hudson Diamond Holding contempt hearing	1.80	815.00	1,467.00
08/25/2023	DEB4	Conference with A. Luft and N. Goradia (Kroll) regarding transfer investigation (0.7); conference with E. Sutton regarding Bento analysis (0.1); correspond with L. Despins regarding same (0.1); correspond with P. Linsey (NPM) regarding bank discovery (0.2); correspond with J. Kosciwicz and W. Farmer regarding Fifth Amendment issues (0.1); correspond with E. Sutton regarding KYC documents (0.1); correspond with regarding Hudson Diamond accounts (0.1); correspond with E. Sutton regarding rule 2004 targets (0.1)	1.50	1,320.00	1,980.00
08/25/2023	ECS1	Review and summarize documents produced in response to discovery requests in the case	1.20	1,015.00	1,218.00
08/25/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.70	1,015.00	710.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	ECS1	Review Bento production documents for financial information and additional matters (2.9); call with Jordan (Kroll) regarding same (.1); call with D. Barron about same (.1); correspond with D. Barron about same (.1); correspond with Kroll regarding same (.2)	3.40	1,015.00	3,451.00
08/25/2023	AEL2	Call with N. Goradia (Kroll) and D. Barron re: fraudulent transfer investigation (.7); prepare summary notes regarding same (.1)	0.80	1,625.00	1,300.00
08/28/2023	DEB4	Correspond with informant information regarding	0.10	1,320.00	132.00
08/28/2023	DEB4	Correspond with informant documents regarding	0.10	1,320.00	132.00
08/28/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.10	1,015.00	101.50
08/28/2023	ECS1	Prepare list of potential targets and descriptions of same for the next Rule 2004 motion	0.10	1,015.00	101.50
08/28/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.40	1,015.00	406.00
08/28/2023	NAB	Correspond with L. Despins regarding Rule 2004 motion argument and related discovery issues (.1); analyze same (.3)	0.40	1,625.00	650.00
08/29/2023	DEB4	Correspond with informant documents (0.3); correspond with J. Barker (Kroll) regarding same (0.1)	0.40	1,320.00	528.00
08/29/2023	ECS1	Review and summarize documents produced in response to discovery in the case	0.10	1,015.00	101.50
08/29/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 requests and subpoenas	0.30	1,015.00	304.50
08/29/2023	ECS1	Review information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	JPK1	Review docket entries regarding service attempts to Saraca Media Incorporated	0.20	915.00	183.00
08/30/2023	DEB4	Correspond with regarding potential assets	0.30	1,320.00	396.00
08/30/2023	ECS1	Prepare responses to rule 2004 targets regarding outstanding rule 2004 motions and subpoenas	0.20	1,015.00	203.00
08/30/2023	ECS1	Analyze information regarding Kwok affiliates and assets, their connections to Kwok, and their corporate information	0.30	1,015.00	304.50
08/30/2023	ECS1	Review submissions and prepare notes for meet and confer with counsel to Yongbing Zhang regarding rule 2004 discovery	1.00	1,015.00	1,015.00
08/30/2023		Analyze ownership issues regarding apartment at 211 W 14th Street, New York	1.30	815.00	1,059.50
08/31/2023	DEB4	Call with Kroll, N. Bassett, A. Luft regarding investigation update and priority action items (1.1); correspond with J. Lazarus (Kroll) regarding bank documents (0.1); correspond with L. Despina and regarding informant information (0.1); correspond with P. Linsey regarding bank discovery (0.1)	1.40	1,320.00	1,848.00
08/31/2023	ECS1	Prepare settlement agreement between the Trustee and the Casper firm (.4); correspond with D. Barron regarding same (.2)	0.60	1,015.00	609.00
08/31/2023	ECS1	Review issues and notes to prepare for meet and confer with J. Nealon, counsel to Yongbing Zhang, regarding rule 2004 discovery (.3); call with J. Nealon and P. Linsey (NPM) regarding same (.8); follow up correspondence with J. Nealon, A. Luft, and P. Linsey regarding same (.2)	1.30	1,015.00	1,319.50
08/31/2023	JPK1	Correspond with N. Bassett regarding Department of Justice subpoena	0.20	915.00	183.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	AEL2	Participate in weekly update call with Kroll, N. Bassett, D. Barron regarding forensic investigation	1.10	1,625.00	1,787.50
08/31/2023		Review information sent by tipster on Kwok-related organizations and persons	0.70	815.00	570.50
08/31/2023	NAB	Participate in update call with Kroll, A. Luft, and D. Barron regarding investigative findings and next steps	1.10	1,625.00	1,787.50
Subtotal: B261 Investigations			288.80		359,729.50
 B262 Contempt Proceedings					
08/16/2023	WCF	Call with D. Carnelli regarding sanctions appeal (NPM) (.2); correspond with D. Carnelli and P. Linsey (NPM) regarding appeal briefs (.2); correspond with N. Bassett regarding appeal deadlines (.1)	0.50	1,235.00	617.50
08/17/2023	NAB	Review and revise draft appellee brief in HK discovery sanctions appeal (1.8); correspond with W. Farmer regarding same (.3); correspond with L. Despins regarding same and additional litigation strategy issues (.2); correspond with A. Luft regarding related issues (.2)	2.50	1,625.00	4,062.50
08/21/2023	NAB	Review revised draft appellate brief in Mei Guo discovery sanctions appeal (.7); correspond with P. Linsey (NPM) and W. Farmer regarding same (.1)	0.80	1,625.00	1,300.00
Subtotal: B262 Contempt Proceedings			3.80		5,980.00
Total			343.70		423,272.75

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	23.60	1,860.00	43,896.00
NAB	Nicholas A. Bassett	Partner	27.20	1,625.00	44,200.00
AB21	Alex Bongartz	Of Counsel	1.40	1,625.00	2,275.00
AEL2	Luft, Avi E.	Of Counsel	52.10	1,625.00	84,662.50
AEL2	Luft, Avi E.	Of Counsel	2.20	812.50	1,787.50
SM29	Shlomo Maza	Associate	1.20	1,320.00	1,584.00
DEB4	Douglass E. Barron	Associate	50.70	1,320.00	66,924.00
WCF	Will C. Farmer	Associate	40.90	1,235.00	50,511.50
ECS1	Ezra C. Sutton	Associate	75.50	1,015.00	76,632.50
JPK1	Jon P. Kosciwicz	Associate	18.20	915.00	16,653.00
		Associate	26.30	815.00	21,434.50
		Associate	3.50	407.50	1,426.25
JK21	Jocelyn Kuo	Paralegal	6.90	540.00	3,726.00
DM26	David Mohamed	Paralegal	14.00	540.00	7,560.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/11/2023	Photocopy Charges	5,083.00	0.08	406.64
08/16/2023	Photocopy Charges	168.00	0.08	13.44
08/16/2023	Photocopy Charges (Color)	10.00	0.20	2.00
08/17/2023	Photocopy Charges	475.00	0.08	38.00
08/22/2023	Photocopy Charges	3,674.00	0.08	293.92
08/22/2023	Photocopy Charges	727.00	0.08	58.16
08/22/2023	Photocopy Charges (Color)	99.00	0.20	19.80
08/28/2023	Photocopy Charges	518.00	0.08	41.44
08/28/2023	Photocopy Charges	670.00	0.08	53.60
08/28/2023	Photocopy Charges	1,022.00	0.08	81.76

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06/05/2023	Taxi/Ground Transportation - Vital Transportation Services, Inc. (USD)(JPMSUA); Invoice # 6060308 dated 06/16/2023; Service Type: Car; From/To: Office/Home, BK; Passenger AVI, LuFT; Ticket # 3725772 dated 06/05/2023 16:42	68.05
06/26/2023	Outside Professional Services - Reversed on 7/26/2023. Serving By Irving Inc., Invoice# YL-4015 Dated 06/26/23, two services of First Set of Requests on Anthony DiBattista and Brian Hofmeister and the attempted service and service of a subpoena on Linwan "Irene" Feng	575.00
06/26/2023	Outside Professional Services - Serving By Irving Inc., Invoice# YL-4014 Dated 06/26/23, two services of First Set of Requests on Anthony DiBattista and Brian Hofmeister and the attempted service and service of a subpoena on Linwan "Irene" Feng	575.00
06/27/2023	Outside Professional Services - Serving By Irving Inc., Invoice# YL-4016 Dated 06/27/23, two services of First Set of Requests on Anthony DiBattista and Brian Hofmeister and the attempted service and service of a subpoena on Linwan "Irene" Feng	1,429.50
06/30/2023	Electronic Document Retrieval - David Mohamed; 06/21/2023; Status reports from DE-SOS on three entities relating to the Kwok matter; Merchant: Delaware corp & tax web	20.00
06/30/2023	Electronic Document Retrieval - David Mohamed; 06/13/2023; Status reports from DE-SOS on three entities relating to the Kwok matter; Merchant: Delaware corp & tax web	20.00
06/30/2023	Electronic Document Retrieval - David Mohamed; 06/12/2023; Status reports from DE-SOS on three entities relating to the Kwok matter; Merchant: Delaware corp & tax web	20.00
06/30/2023	Outside Professional Services - David Mohamed; 06/13/2023; Corporate documents purchased for G News Operations LLC from Business Records Service at NJ.gov; Merchant: Nj busines services	30.10

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07/11/2023	Local - Meals - Grubhub Holdings Inc. f/k/a Seamlessweb (USD) (JPMSUA); Invoice # SL-190-72 dated 07/16/2023; NY Reception; Location: New York; Ordered by C. Pickens on behalf of D. Mohammed. NY 10 person lunch (Fresh Kitchen) for Deposition of Elliot Kwok Levine & Jaroslaw in 26-150 Verrazano. C/M: 50687-00002 . Meeting Date 7/12/23; Order # 910523094578098 dated 07/11/2023	314.83
07/11/2023	Local - Meals - Grubhub Holdings Inc. f/k/a Seamlessweb (USD) (JPMSUA); Invoice # SL-190-72 dated 07/16/2023; NY Reception; Location: New York; Ordered by C. Pickens on behalf of D. Mohammed. NY 1 person Kosher lunch (Kosher Deluxe) for Deposition of Elliot Kwok Levine & Jaroslaw in 26-150 Verrazano. C/M: 50687-00002 . Meeting Date 7/12/23; Order # 593223098586129 dated 07/11/2023	35.33
07/31/2023	Outside Professional Services - Esquire Deposition Solutions, LLC, Invoice# INV2543942 Dated 07/31/23, Equipment Rental – Laptop/iPad for Deponent Matthew Levine	125.00
07/31/2023	Lexis/On Line Search - Courtlink Use - Charges for July 2023	3.05
07/31/2023	Westlaw Business - Intelligize (07/01/23 - 07/31/23)	4.20
08/02/2023	Attorney Service - Metro Attorney Service Inc., Invoice# 39338 Dated 08/02/23, service of TRO, for Kwok proceeding	300.00
08/02/2023	Lexis/On Line Search	1.01
08/02/2023	Lexis/On Line Search	1.01
08/02/2023	Lexis/On Line Search	1.01
08/02/2023	Lexis/On Line Search	17.82
08/02/2023	Lexis/On Line Search	238.03
08/02/2023	Lexis/On Line Search	33.28
08/02/2023	Lexis/On Line Search	66.57
08/02/2023	Lexis/On Line Search	66.57

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08/02/2023	Lexis/On Line Search	66.57
08/02/2023	Lexis/On Line Search	798.48
08/02/2023	Lexis/On Line Search	99.85
08/03/2023	Lexis/On Line Search	576.58
08/04/2023	Westlaw	42.44
08/07/2023	Lexis/On Line Search	31.94
08/07/2023	Westlaw	217.37
08/07/2023	Westlaw	7.49
08/07/2023	Computer Search (Other)	27.90
08/08/2023	Westlaw	1,913.09
08/08/2023	Westlaw	271.90
08/08/2023	Computer Search (Other)	12.51
08/09/2023	Westlaw	24.77
08/10/2023	Westlaw	205.08
08/10/2023	Westlaw	91.98
08/10/2023	Computer Search (Other)	0.27
08/11/2023	Court Reporting Services - Esquire Deposition Solutions, LLC, Invoice# INV2554738 Dated 08/11/23, Preparation of transcripts and video for deposition, for Kwok proceeding.	2,713.69
08/11/2023	Court Reporting Services - Esquire Deposition Solutions, LLC, Invoice# INV2554762 Dated 08/11/23, Preparation of remote video for deposition, for Kwok proceeding.	862.50
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Affiliated Adjustment Group, Ltd.; 3000 Marcus Avenue, Suite 3W3; New Hyde Park, NY 110421009 ; 1ZA6T1632490086671 (MAN)	35.53
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Epiq Corporate Restructuring, LLC; 777 Third Avenue; New York, NY 100171302 ; 1ZA6T1632497448008 (MAN)	35.53

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08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Dundon Advisers LLC; 10 Bank Street, Suite 1100; White Plains, NY 106061948 ; 1ZA6T1632491244686 (MAN)	35.53
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Edmiston and Company Limited; 2 Marina Plaza; Newport, RI 028408534 ; 1ZA6T1632491516909 (MAN)	35.53
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Ross Heinemeyer; 345 E 94th Street; New York, NY 101285694 ; 1ZA6T1632499541377 (MAN)	35.53
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; Limarie Reyes; Limarie Reyes; 125 Harbour Dr.; Humacao, PR 00791 ; 1ZA6T1630198475056 (MAN)	41.12
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Victor Cerde; 17 Jean St; Rye, NY 105803225 ; 1ZA6T1632496526765 (MAN)	42.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Nicholas F. Savio; 3 Dale Court; Hazlet, NJ 077302112 ; 1ZA6T1632493037629 (MAN)	42.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Nicholas F. Savio; 63 New Jersey Ave; Ocean Grove, NJ 07756 ; 1ZA6T1632497915959 (MAN)	42.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; Savio Law LLC; Savio Law LLC; 3 Dale Court; Hazlet, NJ 077302112 ; 1ZA6T1632496483785 (MAN)	42.34

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08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Yongbing Zhang; 223 West Jackson Blvd. #1012; Chicago, IL 606066916 ; 1ZA6T1632494355739 (MAN)	47.49
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; Ana C. Izquiedo-Henn; Ana C. Izquiedo-Henn; Calle 9; Guaynabo, PR 009661609 ; 1ZA6T1630198086048 (MAN)	47.92
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; V.X. Cerde & Associates P.A.; 601 Brickell Key Drive; Miami, FL 331312649 ; 1ZA6T1632493546856 (MAN)	50.44
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; Christopher A. Lilly; c/o TroyGould PC; 1801 Century Park East; Los Angeles, CA 900672302 ; 1ZA6T1632491054140 (MAN)	56.20
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Stretto Stretto; 410 Exchange; Irvine, CA 926021331 ; 1ZA6T1632492055165 (MAN)	56.20
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Ning Zhao; 3611 Summer Ranch Dr.; Katy, TX 774941573 ; 1ZA6T1632494183111 (MAN)	57.24
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Yuanlin Liu; 192 Pendleton Dr.; Amherst, VA 245213980 ; 1ZA6T1632491707195 (MAN)	58.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Xiaoxiao Lin; 24 Sonrisa; Irvine, CA 926201956 ; 1ZA6T1632499517813 (MAN)	63.00
08/11/2023	Lexis/On Line Search	123.37
08/11/2023	Postage/Express Mail - First Class - US;	9.80

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08/11/2023	Westlaw	99.08
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; Ana C. Izquiedo-Henn; IZQUIEDO,ANA; CALLE 9 E3 TINTILLO GARDENS; GUAYNABO, PR 00966 ; 1ZA6T1630198086048 (MAN)	19.50
08/14/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/14/2023; XIAOMING LIU; XIAOMING LIU; 5-16-50 NEMOTOMACHI; GIFU-KEN, 5070065 ; 1ZA6T1636796452835 (MAN)	78.61
08/14/2023	Westlaw	49.52
08/14/2023	Computer Search (Other)	2.34
08/15/2023	Attorney Service - Metro Attorney Service Inc., Invoice# 39443 Dated 08/15/23, Expedited services of a Temporary Restraining Order and Extension of Order on Scott Barnett	425.00
08/15/2023	Computer Search (Other)	1.35
08/17/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/17/2023; Luc Despins; 1ZA6T1630198582387 (MAN)	1.02
08/17/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/17/2023; Luc Despins; 1ZA6T1630198582387 (MAN)	35.25
08/17/2023	Travel Expense - Parking - Luc Despins; 07/12/2023; Parking at Connecticut courthouse for Kwok hearing	13.00
08/17/2023	Travel Expense - Parking - Luc Despins; 06/29/2023; Parking at Connecticut courthouse for Kwok hearing	6.00
08/17/2023	Computer Search (Other)	1.98
08/18/2023	Computer Search (Other)	6.84
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; Limarie Reyes; Limarie Reyes; 125 Harbour Dr.; Humacao, PR 00791 ; 1ZA6T1630313566327 (MAN)	25.34

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08/21/2023	Lexis/On Line Search	133.14
08/21/2023	Westlaw	247.71
08/21/2023	Computer Search (Other)	6.39
08/22/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/22/2023; Hon. Kari A. Dooley; Brien McMahon Federal Building; 915 Lafayette Boulevard - Suite 266; Bridgeport, CT 066044706 ; 1ZA6T1630193024891 (MAN)	28.50
08/23/2023	Local - Meals - Avram Luft; 08/10/2023; Restaurant: White Restaurant; City: New York; Dinner; Number of people: 1; dinner receipt for late work on Kwok brief	30.19
08/23/2023	Computer Search (Other)	0.36
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; Michael McCormack; O'Sullivan McCormack Jensen & Bliss; 180 Glastonbury Blvd.; Glastonbury, CT 060334439 ; 1ZA6T1630196015949 (MAN)	28.50
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; Michael McCormack; O'Sullivan McCormack Jensen & Bliss; 180 Glastonbury Blvd.; Glastonbury, CT 060334439 ; 1ZA6T1630192417674 (MAN)	28.50
08/24/2023	Attorney Service - Metro Attorney Service Inc., Invoice# 39526 Dated 08/24/23, Service of a Memorandum Decision and Order Granting in Part Motion for Preliminary Injunction on Scott Barnett.	425.00
08/24/2023	Outside Professional Services - Divergent Language Solutions, LLC, Invoice# 2023-487 Dated 08/24/23, Chinese Interpretation – Consecutive and Overtime, Expense and Travel	1,276.00
08/25/2023	Taxi/Ground Transportation - ; 08/22/2023; From/To: from Bridgeport Station to court house; Service Type: Lyft; Time: 13:40; taxi ride from Bridgeport Station to court house for hearing in connection with holding Hudson Diamond Holding in contempt	10.75

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00002
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08/25/2023	Taxi/Ground Transportation - ; 08/22/2023; Train ticket from Bridgeport Station to Grand Central after hearing in connection with holding Hudson Diamond Holding in contempt	29.50
08/25/2023	Taxi/Ground Transportation - ; 08/22/2023; Train ticket from Grand Central to Bridgeport Station for hearing in connection with holding Hudson Diamond Holding in contempt	39.50
08/25/2023	Westlaw	49.54
08/27/2023	Computer Search (Other)	4.59
08/28/2023	Computer Search (Other)	1.71
08/30/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163353; 08/30/2023; Michael McCormack; O'Sullivan McCormack Jensen & Bliss; 180 Glastonbury Blvd.; Glastonbury, CT 060334439 ; 1ZA6T1630192731413 (MAN)	28.51
08/30/2023	Westlaw	42.44
08/30/2023	Computer Search (Other)	0.45
08/31/2023	Copies of Documents - Jennifer Ash; 08/02/2023; Document retrieval for E. Sutton - Business status report: Savio Law LLC.; Merchant: Nj busines services	6.25
08/31/2023	Vendor Expense - David Mohamed; 08/03/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/04/2023; Service Charge	20.00
08/31/2023	Vendor Expense - David Mohamed; 08/02/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/03/2023; Service Charge	20.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00002
Invoice No. 2371609

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08/31/2023	Vendor Expense - David Mohamed; 08/03/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/04/2023; Service Charge	20.00
08/31/2023	Vendor Expense - David Mohamed; 08/03/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/04/2023; Service Charge	20.00
08/31/2023	Vendor Expense - David Mohamed; 08/03/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/04/2023; Service Charge	20.00
08/31/2023	Vendor Expense - David Mohamed; 08/03/2023; payment verifications regarding purchase of status reports; Merchant: Delaware Corp & Tax Web Location: 302-739-3073, DE 19901-0000 , Statement Date: 08/31/2023, Post Date: 08/04/2023; Service Charge	20.00
08/31/2023	Vendor Expense - David Mohamed; 08/11/2023; regarding purchase of corporate documents for GS SECURITY SOLUTIONS INC. from NJ Dept. of Revenue in the amount of \$36.55; Merchant: Nj Busines Services Location: Egov.Com, NJ 08608- 0000 , Statement Date: 08/31/2023, Post Date: 08/14/2023; Other; regarding purchase of corporate documents	36.55
08/31/2023	Lexis/On Line Search - Courtlink Use - Charges for August 2023	16.97
08/31/2023	Computer Search (Other)	2.52
Total Costs incurred and advanced		\$17,235.06

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00002
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Current Fees and Costs	\$440,507.81
Total Balance Due - Due Upon Receipt	\$440,507.81



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371610

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Other Litigation

PH LLP Client/Matter # 50687-00003
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$50,735.00
Costs incurred and advanced	49.54
Current Fees and Costs Due	\$50,784.54
Total Balance Due - Due Upon Receipt	\$50,784.54

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371610

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Other Litigation

PH LLP Client/Matter # 50687-00003
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$50,735.00
Costs incurred and advanced	49.54
Current Fees and Costs Due	\$50,784.54
Total Balance Due - Due Upon Receipt	\$50,784.54

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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371610

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Other Litigation **\$50,735.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/02/2023	AB21	Review SDNY decision dismissing claims against PH and trustee	0.30	1,625.00	487.50
08/02/2023	ECS1	Correspond with D. Barron regarding comparison of Debtor's superseding and original indictment	0.20	1,015.00	203.00
08/02/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/03/2023	AB21	Correspond with J. Kuo regarding statement regarding SDNY decision dismissing claims against PH and trustee (0.1); revise same (0.2)	0.30	1,625.00	487.50
08/03/2023	JK21	Prepare notice of filing of SDNY Opinion and Order in An v. Despins, 22-cv-10062	0.70	540.00	378.00
08/03/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00003
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Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2023	AB21	Revise statement regarding SDNY decision dismissing lawsuit against PH and trustee (0.1); correspond with J. Kuo regarding filing of same (0.1)	0.20	1,625.00	325.00
08/04/2023	JK21	Electronically file with the court statement regarding SDNY Opinion and Order in An v. Despins, 22-cv-10062	0.40	540.00	216.00
08/04/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/05/2023	LAD4	Review Bove DQ motion etc. in criminal case	2.10	1,860.00	3,906.00
08/07/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/08/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/09/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/10/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/11/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/14/2023	ECS1	Correspond with D. Mohamed regarding calendar deadlines for status letters in Case 1:20-cv-05678-KPF, Cheng v. Guo case (.3); update issues/task list regarding same (.1); correspond with W. Farmer regarding same (.1)	0.50	1,015.00	507.50
08/14/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/15/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/16/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/17/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/18/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00003
Invoice No. 2371610

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/21/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/22/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins	0.20	540.00	108.00
08/23/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins update	0.20	540.00	108.00
08/24/2023	DEB4	Correspond with S. Sarnoff (OMM) regarding statement filed in bankruptcy court related to FARA action	0.10	1,320.00	132.00
08/24/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins update	0.20	540.00	108.00
08/25/2023	JK21	Review recent filings in Kwok criminal case and appeals for L. Despins update	0.20	540.00	108.00
08/28/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins	0.20	540.00	108.00
08/29/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins	0.20	540.00	108.00
08/30/2023	JK21	Review Kwok criminal case and appeals for newly filed pleadings for L. Despins	0.20	540.00	108.00
08/30/2023	JK21	Review Kwok criminal case in connection with motion to stay bankruptcy cases (0.6); correspond with L. Despins regarding motion to stay bankruptcy cases (0.3)	0.90	540.00	486.00
08/30/2023	LAD4	Analyze/comment on criminal stay papers (2.90); multiple emails to A. Luft, N. Bassett, P. Linsey re: same (2.20)	5.10	1,860.00	9,486.00
08/30/2023	AEL2	Analyze motion to stay bankruptcy case	1.40	1,625.00	2,275.00
08/30/2023	AEL2	Analyze brief seeking stay of bankruptcy	1.80	1,625.00	2,925.00
08/30/2023	AEL2	Review and revise proposed filing re: criminal attempt to stay	0.40	1,625.00	650.00
08/30/2023	NAB	Review Debtor's motion in criminal case to stay bankruptcy case (.5); begin analyzing response to same (.6); correspond with L. Despins regarding same (.2); analyze authority regarding same (.5); correspond with P. Linsey (NPM) regarding same (.2)	2.00	1,625.00	3,250.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00003
Invoice No. 2371610

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	AB21	Review Debtor's motion to stay bankruptcy case (0.6); correspond with L. Despins regarding same (0.2)	0.80	1,625.00	1,300.00
08/31/2023	DEB4	Correspond with L. Despins regarding motion to stay filed in criminal case	0.30	1,320.00	396.00
08/31/2023	ECS1	Review pleading in connection with Brown Rudnick motion for partial stay in bankruptcy case (.1); correspond with L. Despins regarding same (.2)	0.30	1,015.00	304.50
08/31/2023	ECS1	Prepare emergency motion to enjoin debtor's motion to stay bankruptcy case (1.9); correspond with N. Bassett and P Linsey (NPM) regarding same (.4)	2.30	1,015.00	2,334.50
08/31/2023	JK21	Review Kwok criminal case (.2); correspond L. Despins regarding newly filed documents (.1)	0.30	540.00	162.00
08/31/2023	LAD4	Analyze/outline criminal stay matter all day (5.40); t/c S. Sarnoff/P. Friedman (OMM) and N. Bassett re: same (.60)	6.00	1,860.00	11,160.00
08/31/2023	AE12	Correspond with N. Bassett and L. Despins re: issues with attempt to stay bankruptcy	0.80	1,625.00	1,300.00
08/31/2023	NAB	Analyze issues related to motion to stay criminal case (.7); call with L. Despins, P. Friedman (OMM), and S. Sarnoff (OMM) regarding same (.6); begin preparing draft motion to file in bankruptcy court to enjoin stay motion (1.3); analyze authority related to same (.6); call with L. Despins, D. Barron and DOJ regarding motion to stay bankruptcy case (.3)	3.50	1,625.00	5,687.50
Subtotal: B191 General Litigation			35.10		50,735.00
Total			35.10		50,735.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
 50687-00003
 Invoice No. 2371610

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	13.20	1,860.00	24,552.00
NAB	Nicholas A. Bassett	Partner	5.50	1,625.00	8,937.50
AB21	Alex Bongartz	Of Counsel	1.60	1,625.00	2,600.00
AEL2	Luft, Avi E.	Of Counsel	4.40	1,625.00	7,150.00
DEB4	Douglass E. Barron	Associate	0.40	1,320.00	528.00
ECS1	Ezra C. Sutton	Associate	3.30	1,015.00	3,349.50
JK21	Jocelyn Kuo	Paralegal	6.70	540.00	3,618.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	Westlaw			49.54
Total Costs incurred and advanced				\$49.54

Current Fees and Costs	\$50,784.54
Total Balance Due - Due Upon Receipt	\$50,784.54



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371612

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Sales Process

PH LLP Client/Matter # 50687-00005
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$2,275.00
Costs incurred and advanced	23.60
Current Fees and Costs Due	\$2,298.60
Total Balance Due - Due Upon Receipt	\$2,298.60

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Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371612

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Sales Process

PH LLP Client/Matter # 50687-00005
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$2,275.00
Costs incurred and advanced	23.60
Current Fees and Costs Due	\$2,298.60
Total Balance Due - Due Upon Receipt	\$2,298.60

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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371612

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Sales Process **\$2,275.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B130 Asset Disposition					
08/03/2023	AB21	Call with D. Johnson (Edmiston) regarding Lady May II sale process (0.2); correspond with L. Despins regarding same (0.1)	0.30	1,625.00	487.50
08/08/2023	AB21	Call with S. Perry (Alley Maass) regarding bill of sale of tender (0.1); correspond with L. Despins regarding same (0.1); review same (0.1); correspond with S. Perry regarding same (0.1)	0.40	1,625.00	650.00
08/15/2023	AB21	Correspond with L. Despins regarding sale process with respect to Lady May II	0.10	1,625.00	162.50
08/22/2023	AB21	Call with D. Johnson (Edmiston) regarding Lady May II sale process (0.2); correspond with L. Despins regarding same (0.1); correspond with D. Johnson regarding same (0.1)	0.40	1,625.00	650.00
08/23/2023	AB21	Call with D. Johnson (Edmiston) regarding Lady May II update	0.10	1,625.00	162.50

Luc Despina as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00005
Invoice No. 2371612

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	AB21	Correspond with D. Johnson (Edmiston) regarding Lady May II sale process	0.10	1,625.00	162.50
Subtotal: B130 Asset Disposition			1.40		2,275.00
Total			1.40		2,275.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
AB21	Alex Bongartz	Of Counsel	1.40	1,625.00	2,275.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
06/30/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163273; 06/30/2023; LINDA M. DUNN; MARINE DOCUMENTATION, INC; 40 MARY ST; NEWPORT, RI 028403041 ; 1ZA6T1630194134252 (MAN)			23.60
Total Costs incurred and advanced				\$23.60

Current Fees and Costs **\$2,298.60**

Total Balance Due - Due Upon Receipt **\$2,298.60**



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371614

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Genever US

PH LLP Client/Matter # 50687-00010
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$102,545.50
Costs incurred and advanced	69.17
Current Fees and Costs Due	\$102,614.67
Total Balance Due - Due Upon Receipt	\$102,614.67

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Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
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PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371614

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Genever US

PH LLP Client/Matter # 50687-00010
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$102,545.50
Costs incurred and advanced	69.17
Current Fees and Costs Due	\$102,614.67
Total Balance Due - Due Upon Receipt	\$102,614.67

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Genever US

\$102,545.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B130 Asset Disposition					
08/31/2023	AB21	Call with E. Sutton regarding auction motion with respect to SN furniture	0.10	1,625.00	162.50
08/31/2023	ECS1	Analyze application of procedural rules in connection with auction motion regarding Debtor's furniture (.8); call with A. Bongartz regarding same (.1)	0.90	1,015.00	913.50
Subtotal: B130 Asset Disposition			1.00		1,076.00
B131 Sale of Real Estate					
08/07/2023		Analyze application of Bankruptcy Code section 365 to proprietary lease with a coop	0.60	815.00	489.00
08/16/2023	AB21	Correspond with L. Despins regarding listing prices for SN apartment (0.1); review email from Sotheby's team regarding same (0.2)	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	AB21	Correspond with L. Despins regarding true lease issue (0.1); correspond with regarding same (0.1); further correspond with L. Despins regarding same (0.1)	0.30	1,625.00	487.50
08/18/2023	DEB4	Correspond with A. Bongartz regarding proprietary lease	0.10	1,320.00	132.00
08/18/2023		Review authority on bankruptcy court treatment of proprietary leases	0.30	815.00	244.50
08/19/2023		Analyze case law on bankruptcy court treatment of proprietary leases	2.70	815.00	2,200.50
08/20/2023	AB21	Review email from regarding coop leases	0.20	1,625.00	325.00
08/21/2023		Analyze curing defaults in sale of proprietary lease	0.60	815.00	489.00
Subtotal: B131 Sale of Real Estate			5.10		4,855.00

B165 Fee/Employment Applications for Other Professionals

08/02/2023	AB21	Revise McCormack retention application (0.6); correspond with L. Despins regarding same (0.3); correspond with M. McCormack (McCormack) regarding same (0.1)	1.00	1,625.00	1,625.00
08/02/2023	LAD4	Review/edit O'Sullivan retention app	0.50	1,860.00	930.00
08/03/2023	AB21	Revise McCormack retention application (0.3); correspond with L. Despins regarding same (0.3); correspond with M. McCormack (McCormack) regarding same (0.2)	0.80	1,625.00	1,300.00
08/04/2023	AB21	Finalize McCormack retention application (0.2); correspond with J. Kuo regarding filing of same (0.1)	0.30	1,625.00	487.50
08/04/2023	JK21	Electronically file with the court application to retain O'Sullivan as special insurance coverage counsel (0.4); review and comment on service of application to retain O'Sullivan as special insurance coverage counsel (0.2)	0.60	540.00	324.00

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Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2023	LAD4	Review Saxe fee app	1.10	1,860.00	2,046.00
		Subtotal: B165 Fee/Employment Applications for Other Professionals	4.30		6,712.50

B190 Other Contested Matters(excl. assumption/rejections motions)

08/09/2023	KC27	Correspond with A. Bongartz regarding motion to remediate Sherry Netherland apartment (.6); calls with A. Bongartz regarding same (.2)	0.80	915.00	732.00
08/10/2023	AB21	Correspond with L. Despins regarding architect motion (0.1); call with K. Catalano regarding same (0.1)	0.20	1,625.00	325.00
08/10/2023	KC27	Prepare Genever US motion to enter into architect agreement (2.9); call with A. Bongartz regarding same (.1)	3.00	915.00	2,745.00
08/11/2023	AB21	Correspond with D. Acheson (architect) regarding architect agreement (0.3); call with K. Catalano regarding related motion (0.2)	0.50	1,625.00	812.50
08/11/2023	KC27	Prepare motion to enter into architectural contract for remediation of Sherry Netherland apartment (7.0); call with A. Bongartz regarding same (.2)	7.20	915.00	6,588.00
08/12/2023	KC27	Prepare motion to enter into architectural agreement for Sherry Netherland apartment	4.30	915.00	3,934.50
08/13/2023	AB21	Correspond with L. Despins regarding architect motion for SN apartment	0.10	1,625.00	162.50
08/14/2023	AB21	Call with K. Catalano regarding motion approving entry into architect agreement for SN apartment	0.20	1,625.00	325.00
08/14/2023	KC27	Prepare Sherry Netherland remediation motion (3.4); call with A. Bongartz regarding same (.2)	3.60	915.00	3,294.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/2023	AB21	Revise architect motion for SN apartment remediation (3.7); calls with K. Catalano regarding same (0.3); call with D. Acheson (architect) regarding remediation project (0.7); call with L. Despins regarding same (0.2)	4.90	1,625.00	7,962.50
08/15/2023	KC27	Revise Sherry Netherland remediation motion (3.5); calls with A. Bongartz regarding same (.3)	3.80	915.00	3,477.00
08/16/2023	AB21	Revise remediation motion for Sherry Netherland apartment (1.6); correspond with D. Acheson (architect) regarding same (0.2); call and correspond with K. Catalano regarding same (0.1); correspond with L. Despins regarding same (0.1)	2.00	1,625.00	3,250.00
08/16/2023	KC27	Prepare parts of Sherry Netherland remediation motion (1.8); call and correspond with A. Bongartz regarding same (.1)	1.90	915.00	1,738.50
08/17/2023	AB21	Prepare parts of remediation motion (2.0); correspond with K. Catalano regarding same (0.1); correspond with D. Acheson (architect) regarding same (0.2); conference with L. Despins regarding same (0.2); correspond with S. Millman (Stroock) regarding same (0.1); correspond with P. Friedman (OMM) and I. Goldman (Pullman) regarding same (0.1); correspond with M. Cyganowski (Sales Officer) regarding same (0.1); review proposal from asbestos surveyor (0.2); correspond with G. Chomenko (Galagher Bassett) regarding same (0.1); call with G. Chomenko regarding same (0.1); conference with L. Despins regarding update on remediation process (0.1); correspond with L. Despins regarding same (0.1)	3.40	1,625.00	5,525.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	AB21	Revise remediation motion (1.8); analyze related issues (1.2); correspond with L. Despins regarding same (0.6); correspond with S. Millman (Stroock) regarding same (0.1); correspond with D. Acheson (architect) regarding work plan (0.1); correspond with G. Chomenko (GBTS) regarding asbestos survey (0.1); revise motion to limit service of remediation motion (0.2)	4.10	1,625.00	6,662.50
08/18/2023	KC27	Prepare motion to limit service for Sherry Netherland remediation motion	0.80	915.00	732.00
08/20/2023	AB21	Correspond with L. Despins regarding update on remediation motion	0.20	1,625.00	325.00
08/21/2023	AB21	Correspond with P. Friedman (O'Melveny) and I. Goldman (Pullman) regarding draft remediation motion (0.1); correspond with L. Despins regarding same (0.1); revise same (0.3); correspond with D. Acheson (architect) regarding architect agreement (0.1); correspond with G. Chomenko (GBTS) regarding asbestos survey (0.1)	0.70	1,625.00	1,137.50
08/21/2023	LAD4	Review/edit remediation motion	1.40	1,860.00	2,604.00
08/22/2023	AB21	Revise remediation motion (1.6); correspond with P. Friedman (O'Melveny) and I. Goldman (Pullman) regarding same (0.6); correspond with L. Despins regarding same (0.3); call with L. Despins regarding same (0.1); calls with S. Maza regarding same (0.1); correspond with S. Millman (Stroock) regarding same (0.4); calls with D. Acheson (architect) regarding architect agreement (0.5); revise same (1.0); calls with S. Maza regarding same (0.2); correspond with D. Acheson regarding same (0.3); correspond with L. Despins regarding same (0.1)	5.20	1,625.00	8,450.00
08/22/2023	KC27	Call with S. Maza regarding filing of Sherry Netherland remediation motion	0.40	915.00	366.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023	LAD4	Review/edit revised renovation motion (1.40); t/c A. Bongartz re: same (0.1); various emails to A. Bongartz re: same (0.6)	2.10	1,860.00	3,906.00
08/23/2023	AB21	Finalize remediation motion and related motion to limit notice (0.9); correspond with S. Maza regarding same (0.1); call with P. Linsey (Neubert) regarding same (0.1); correspond with J. Kuo regarding same (0.2); review final version of architect agreement (0.1); correspond with L. Despins regarding same (0.1); correspond with D. Acheson (architect) regarding same (0.1)	1.60	1,625.00	2,600.00
08/23/2023	JK21	Prepare for electronic filing remediation motion (0.2); prepare for electronic filing motion to limit service of same (0.2); electronically file with the court remediation motion (0.3); electronically file with the court motion to limit service (0.3)	1.00	540.00	540.00
08/23/2023	LAD4	Review/edit final renovation motion	0.50	1,860.00	930.00
08/24/2023	JK21	Review and comment on service of remediation pleadings (0.3); prepare certificate of service regarding remediation pleadings (0.3)	0.60	540.00	324.00
08/25/2023	JK21	Electronically file with the court certificate of service regarding remediation pleadings	0.30	540.00	162.00
Subtotal: B190 Other Contested Matters(excl. assumption/rejections motions)			54.80		69,610.50

B210 Business Operations

08/02/2023	LAD4	T/c M. Ullman (SN) re: alarm replacement	0.30	1,860.00	558.00
08/04/2023	AB21	Correspond with L. Despins regarding architect proposal for apartment remediation	0.20	1,625.00	325.00

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Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/08/2023	AB21	Analyze architect proposal, next steps, timeline, and sequencing for remediation process for SN apartment (1.5); conference with L. Despins regarding same (0.3); correspond with L. Despins regarding same (0.2); call with L. Despins and J. Panico (AAGL) regarding same (0.2); correspond with J. Panico regarding same (0.1); correspond with M. Ullman (Sherry Netherland) regarding same (0.1); call with L. Despins and D. Acheson (architect) regarding same (0.7); call with P. Linsey (Neubert) regarding update on same (0.1)	3.20	1,625.00	5,200.00
08/08/2023	LAD4	Meeting A. Bongartz re: architect (.30); t/c J. Panico (adjuster) and A. Bongartz re: same and timeline (.20); t/c A. Bongartz and D. Acheson (architect) (.70)	1.20	1,860.00	2,232.00
08/09/2023	AB21	Correspond with D. Acheson (architect) regarding architect agreement with respect to SN apartment remediation (1.0); correspond with L. Despins regarding same (0.1); analyze issues regarding related motion (0.3); call with P. Linsey (Neubert) regarding same (0.1); calls with K. Catalano regarding same (0.2)	1.70	1,625.00	2,762.50
08/15/2023	LAD4	T/c A. Bongartz re: renovation project timeline	0.20	1,860.00	372.00
08/16/2023	DEB4	Correspond with L. Despins regarding apartment sale contract (0.1); correspond with L. Despins regarding insurance documents (0.1); correspond with S. Maza regarding same (0.4)	0.60	1,320.00	792.00
08/16/2023	DEB4	Conference with S. Maza and C. Skibitcky and A. Wolfson (Wolfson) regarding Genever insurance	0.40	1,320.00	528.00
08/16/2023	SM29	Correspond with L. Despins re insurance policy and broker (.1); call with broker and D. Barron re same (.4); email L. Despins re same (.1)	0.60	1,320.00	792.00

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Page 8

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2023	LAD4	Meetings A. Bongartz re: status of remediation project (.30); review timeline re: same (.90)	1.20	1,860.00	2,232.00
08/22/2023	SM29	Review remediation motion and UCC comments thereto (.4); calls with A. Bongartz re same and architect agreement (.3); call with K. Catalano re remediation motion (.2); review related contractor agreements (.5)	1.40	1,320.00	1,848.00
08/23/2023	DEB4	Correspond with C. Skibitcky regarding insurance policy	0.10	1,320.00	132.00
08/24/2023	AB21	Correspond with L. Despins regarding alteration agreement with Sherry Netherland	0.20	1,625.00	325.00
08/28/2023	AB21	Call with D. Acheson (architect) regarding remediation game plan (0.1); correspond with L. Despins regarding same (0.1); review ABF asbestos removal proposal (0.1)	0.30	1,625.00	487.50
08/28/2023	LAD4	T/c S. Millman (Stroock) re: update on renovation	0.30	1,860.00	558.00
08/29/2023	AB21	Correspond with T. Sadler regarding GBTS invoice	0.10	1,625.00	162.50
08/30/2023	AB21	Correspond with D. Acheson (architect) and M. Ullman (Sherry Netherland) regarding ABF proposal on asbestos removal	0.10	1,625.00	162.50
08/31/2023	AB21	Correspond with D. Acheson (architect) regarding update on asbestos removal at SN apartment	0.10	1,625.00	162.50
Subtotal: B210 Business Operations			12.20		19,631.50

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Page 9

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B211 Financial Reports (Monthly Operating Reports)					
08/03/2023	DEB4	Correspond with D. Skalka (NPM) and P. Linsey (NPM) regarding draft MORs (0.1); review same (0.1); prepare global notes in connection with same (0.3)	0.50	1,320.00	660.00
Subtotal: B211 Financial Reports (Monthly Operating Reports)			0.50		660.00
Total			77.90		102,545.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	8.80	1,860.00	16,368.00
AB21	Alex Bongartz	Of Counsel	32.00	1,625.00	52,000.00
SM29	Shlomo Maza	Associate	2.00	1,320.00	2,640.00
DEB4	Douglass E. Barron	Associate	1.70	1,320.00	2,244.00
ECS1	Ezra C. Sutton	Associate	0.90	1,015.00	913.50
KC27	Kristin Catalano	Associate	25.80	915.00	23,607.00
		Associate	4.20	815.00	3,423.00
JK21	Jocelyn Kuo	Paralegal	2.50	540.00	1,350.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
06/06/2023	Taxi/Ground Transportation - Skyline Credit Ride, Inc. (USD) (JPMSUA); Invoice # 6063695 dated 06/30/2023; Service Type: Car; From/To: Office/Home; Passenger DAVID, Mohammed; Ticket # 278880 dated 06/06/2023 23:46			69.17
Total Costs incurred and advanced				\$69.17

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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Page 10

Current Fees and Costs	\$102,614.67
Total Balance Due - Due Upon Receipt	\$102,614.67



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September 18, 2023

Please Refer to
Invoice Number: 2371615

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Genever BVI

PH LLP Client/Matter # 50687-00011
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$2,386.50

Current Fees and Costs Due

\$2,386.50

Total Balance Due - Due Upon Receipt

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PH LLP Client/Matter # 50687-00011
Luc A. Despins

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for the period ending August 31, 2023

\$2,386.50

Current Fees and Costs Due

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Total Balance Due - Due Upon Receipt

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September 18, 2023

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Invoice Number: 2371615

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending August 31, 2023

Genever BVI **\$2,386.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B210 Business Operations					
08/01/2023	AB21	Revise draft repayment agreement (0.7); call with A. Thorp regarding Harneys fees (0.1); correspond with C. Abrehart (Genever BVI director) regarding same (0.1)	0.90	1,625.00	1,462.50
Subtotal: B210 Business Operations			0.90		1,462.50
B211 Financial Reports (Monthly Operating Reports)					
08/01/2023	DEB4	Correspond with D. Skalka (NPM) regarding MORs	0.30	1,320.00	396.00
08/03/2023	DEB4	Correspond with D. Skalka (NPM) regarding MORs (0.1); conference with P. Linsey (NPM) regarding same (0.1)	0.20	1,320.00	264.00
08/24/2023	DEB4	Correspond with D. Skalka (NPM) regarding MORs	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	DEB4	Correspond with D. Skalka regarding MOR	0.10	1,320.00	132.00
Subtotal: B211 Financial Reports (Monthly Operating Reports)			0.70		924.00
Total			1.60		2,386.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
AB21	Alex Bongartz	Of Counsel	0.90	1,625.00	1,462.50
DEB4	Douglass E. Barron	Associate	0.70	1,320.00	924.00

Current Fees and Costs **\$2,386.50**

Total Balance Due - Due Upon Receipt **\$2,386.50**



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371616

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Mahwah Adversary Proceeding

PH LLP Client/Matter # 50687-00012
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$313,918.75
Costs incurred and advanced	3,859.98
Current Fees and Costs Due	\$317,778.73
Total Balance Due - Due Upon Receipt	\$317,778.73

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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REMITTANCE COPY

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PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Mahwah Adversary Proceeding **\$313,918.75**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
08/14/2023	LAD4	Prepare for hearing by reviewing all exhibits (videos etc.) (2.80); handle hearing including testimony (5.90); post-mortem N. Bassett, A. Luft re: same and next steps (.40)	9.10	1,860.00	16,926.00
08/14/2023	AEL2	Participate in Mahwah preliminary injunction hearing (5.9); conference with L. Despins and N. Bassett following same (.4); analyze open issues and next steps (.4)	6.70	1,625.00	10,887.50
08/14/2023		Attend Mahwah PI hearing in Bridgeport, Connecticut (5.9); prepare notes regarding follow up issues and next steps (.8)	6.70	815.00	5,460.50
08/14/2023	NAB	Participate in hearing on motion for preliminary injunction (5.9); conference with L. Despins and A. Luft regarding next steps following hearing (.4)	6.30	1,625.00	10,237.50
08/29/2023	LAD4	T/c N. Bassett re: hearing prep (.20); review submissions, notes to prepare for hearing and handle hearing on DOJ settlement etc. (1.80); t/c N. Bassett re: report on hearing (.30)	2.30	1,860.00	4,278.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Subtotal: B155 Court Hearings			31.10		47,789.50

B191 General Litigation

08/01/2023	DEB4	Correspond with L. Despins regarding DOJ stipulation	0.10	1,320.00	132.00
08/01/2023	DEB4	Conference with L. Despins, N. Bassett and W. Farmer regarding TRO ruling	0.50	1,320.00	660.00
08/01/2023	DEB4	Correspond with S. Maza and regarding TRO	0.20	1,320.00	264.00
08/01/2023	DEB4	Analyze TRO ruling	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with L. Despins regarding TRO	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with L. Despins regarding rule 9019 motion	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with regarding TRO service (0.1); correspond with S. Maza regarding same (0.1)	0.20	1,320.00	264.00
08/01/2023	ECS1	Correspond with about service of TRO in Mahwah AP (.2); review issues regarding service of TRO (.1)	0.30	1,015.00	304.50
08/01/2023	LAD4	T/c W. Farmer, N. Bassett, D. Barron re: next steps (.50); analyze/comment on same (2.40)	2.90	1,860.00	5,394.00
08/01/2023	AEL2	Review TRO order	0.30	1,625.00	487.50
08/01/2023		Prepare service of the TRO on defendants	1.10	815.00	896.50
08/01/2023		Prepare draft certificate of service of the TRO	1.10	815.00	896.50
08/01/2023	NAB	Review TRO decision and related papers (.3); call with L. Despins, D. Barron, and W. Farmer regarding same and next steps (.5)	0.80	1,625.00	1,300.00
08/01/2023	WCF	Analyze TRO issued by Bankruptcy Court regarding Mahwah mansion and assets (.1); call with L. Despins, N. Bassett, D. Barron regarding response to TRO decision (.5)	0.60	1,235.00	741.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	DEB4	Correspond with E. Sutton regarding Mahwah pleadings (0.3); correspond with L. Despins regarding same (0.1); correspond with P. Linsey (NPM) regarding same (0.1); correspond with I Goldman (Pullman) regarding same (0.1); correspond with S. Sarnoff (OMM) regarding same (0.1)	0.70	1,320.00	924.00
08/02/2023	ECS1	Review pleadings in connection with Mahwah adversary proceeding (.1); prepare certificate of service regarding Mahwah TRO (.1); correspond with about same (.1); correspond with D. Barron regarding same (.1)	0.40	1,015.00	406.00
08/02/2023		Prepare revised draft certificate of service	0.60	815.00	489.00
08/03/2023	DEB4	Revise certificate of service (0.3); correspond with E. Sutton regarding same (0.1); correspond with L. Despins regarding same (0.1); prepare email to Court regarding same (0.2); analyze sealing and TRO orders (0.1)	0.80	1,320.00	1,056.00
08/03/2023	ECS1	Prepare certificate of service for TRO in Mahwah adversary proceeding	0.20	1,015.00	203.00
08/03/2023	ECS1	Prepare emails to certain parties in interest regarding Mahwah filings (1.0); prepare sealed and unsealed documents in connection with same (.1); correspond with D. Barron regarding same (.2)	1.30	1,015.00	1,319.50
08/04/2023	DEB4	Conference with E. Sutton regarding unsealed Mahwah documents (0.2); correspond with L. Despins regarding same (0.2); follow up correspondence with E. Sutton regarding same (0.2)	0.60	1,320.00	792.00
08/04/2023	ECS1	Prepare emails to certain Mahwah parties regarding Mahwah filings (.3); conference with D. Barron regarding same (.2)	0.50	1,015.00	507.50

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08/05/2023	DEB4	Correspond with L. Despins regarding rule 9019 motion (0.1); correspond with and S. Maza regarding service issues (0.1); correspond with S. Sarnoff (0MM) regarding complaint (0.2)	0.40	1,320.00	528.00
08/05/2023		Review live broadcast with Qidong Xia held in the Mahwah mansion	0.80	815.00	652.00
08/06/2023	DEB4	Prepare parts of rule 9019 motion for DOJ stipulation	5.40	1,320.00	7,128.00
08/06/2023	DEB4	Correspond with N. Bassett and regarding Mahwah complaint (0.1); correspond with L. Despins regarding rule 9019 motion (0.1)	0.20	1,320.00	264.00
08/06/2023	NAB	Correspond with D. Barron regarding information for preliminary injunction hearing (.1); outline plan for preliminary injunction hearing (.4)	0.50	1,625.00	812.50
08/07/2023	DEB4	Conference with regarding motion to limit notice	0.10	1,320.00	132.00
08/07/2023	DEB4	Conferences with S. Maza regarding rule 9019 motion and related case matters	0.40	1,320.00	528.00
08/07/2023	DEB4	Prepare parts of rule 9019 motion for DOJ stipulation	2.90	1,320.00	3,828.00
08/07/2023	DEB4	Correspond with L. Despins regarding service issues	0.10	1,320.00	132.00
08/07/2023	DEB4	Conference with P. Linsey (NPM) regarding issuance of summons (0.2); correspond with and S. Maza regarding same (0.1); further correspond with regarding same (0.1)	0.40	1,320.00	528.00
08/07/2023	DEB4	Correspond with regarding rule 9019 motion	0.10	1,320.00	132.00
08/07/2023	DEB4	Conference with L. Despins regarding rule 9019 motion	0.20	1,320.00	264.00
08/07/2023	LAD4	Review/edit (2X) motion to approve DOJ settlement (1.9); t/c D. Barron re: same (.20)	2.10	1,860.00	3,906.00

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08/07/2023	AEL2	Review documents related to complaint for preliminary injunction hearing	1.20	1,625.00	1,950.00
08/07/2023		Prepare service of summons and complaint on defendants	2.00	815.00	1,630.00
08/07/2023		Prepare exhibit list for Mahwah preliminary injunction hearing	0.40	815.00	326.00
08/07/2023		Prepare motion to limit service regarding the rule 9019 motion (1.9); call with D. Barron regarding same (.10)	2.00	815.00	1,630.00
08/07/2023	NAB	Review submissions and prepare parts of presentation for preliminary injunction hearing (.7); correspond with W. Farmer regarding same (.1)	0.80	1,625.00	1,300.00
08/07/2023	SM29	Call with D. Barron re rule 9019 motion (.2); further call with D. Barron re same and related case matters (.2); review rule 9019 motion (.4)	0.80	1,320.00	1,056.00
08/08/2023	DEB4	Prepare insert to rule 9019 motion	0.80	1,320.00	1,056.00
08/08/2023	JK21	Correspond with and S. Maza regarding issued summons and service of same	0.20	540.00	108.00
08/08/2023	LAD4	Final review/edit of rule 9019 motion	0.70	1,860.00	1,302.00
08/08/2023	AEL2	Analyze Mahwah evidence in preparation for hearing	3.10	1,625.00	5,037.50
08/08/2023		Conference with UnitedLex regarding digital evidence for preliminary injunction hearing	0.60	815.00	489.00
08/08/2023		Prepare exhibit and witness lists for preliminary injunction hearing	1.50	815.00	1,222.50
08/08/2023	NAB	Call with W. Farmer regarding preliminary injunction hearing (.2); review authority and prepare related presentation for same (.4)	0.60	1,625.00	975.00

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08/08/2023	WCF	Call with N. Bassett regarding TRO/PI hearing and authentication declaration (.2); review November/December 2022 TRO/PI hearing transcript regarding admissibility of digital evidence (.8); draft UnitedLex digital evidence authentication declaration (.3)	1.30	1,235.00	1,605.50
08/09/2023	DEB4	Prepare parts of rule 9019 motion	1.00	1,320.00	1,320.00
08/09/2023	DEB4	Correspond with regarding Scott Barnett	0.20	1,320.00	264.00
08/09/2023	AEI2	Calls with Promemoria re: information on Mahwah renovation	0.40	1,625.00	650.00
08/09/2023	AEI2	Correspond with L. Despins and N. Bassett re: Mahwah township	0.30	1,625.00	487.50
08/09/2023	AEI2	Meeting with S. Maza, , N. Bassett, and W. Farmer re: Mahwah evidence for preliminary injunction hearing	0.60	1,625.00	975.00
08/09/2023		Review production on Relativity for HCHK's involvement with the renovations to Mahwah mansion	1.60	815.00	1,304.00
08/09/2023		Prepare certificate of service of summons and complaint	1.00	815.00	815.00
08/09/2023		Prepare motion for alternative service on Taurus Fund	0.90	815.00	733.50
08/09/2023		Conference with N. Bassett, A. Luft, W. Farmer, S. Maza on evidentiary issues for Mahwah preliminary injunction hearing	0.60	815.00	489.00
08/09/2023		Review deed of Mahwah mansion and construction liens	0.80	815.00	652.00
08/09/2023		Supplement exhibit list for the Mahwah preliminary injunction hearing	0.20	815.00	163.00
08/09/2023	NAB	Review evidentiary issues and supplement presentation for PI hearing (.4); call with A. Luft, W. Farmer, , and S. Maza regarding same (.6)	1.00	1,625.00	1,625.00

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08/09/2023	SM29	Call with _____, W. Farmer, N. Bassett, A. Luft re hearing prep (.6); correspond with D. Barron re same (.3); correspond with re evidentiary issues (.4)	1.30	1,320.00	1,716.00
08/09/2023	SM29	Correspond with N. Bassett, A. Luft, _____, and D. Barron re evidence and trial prep (.3); further correspond with D. Barron re same (.1)	0.40	1,320.00	528.00
08/09/2023	WCF	Call with _____, S. Maza, A. Luft, and N. Bassett regarding preliminary injunction hearing preparations (.6); review draft exhibit list regarding admissibility issues (.2)	0.80	1,235.00	988.00
08/10/2023	DEB4	Revise rule 9019 motion	0.50	1,320.00	660.00
08/10/2023	DEB4	Correspond with J. Kuo regarding rule 9019 motion	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with J. Murray (DOJ) regarding rule 9019 motion	0.10	1,320.00	132.00
08/10/2023	AEL2	Revise draft motion for clarification re: preliminary injunction hearing	0.30	1,625.00	487.50
08/10/2023	AEL2	Correspond with P. Linsey (NPM) and W. Farmer re: objections	0.20	1,625.00	325.00
08/10/2023	AEL2	Call with P. Linsey, N. Bassett and S. Maza re: clarification motion for Mahwah preliminary injunction hearing	0.50	1,625.00	812.50
08/10/2023		Review government briefs in Kwok's criminal case for information on Mahwah home	0.40	815.00	326.00
08/10/2023		Analyze Nevada law on service of process on Taurus Fund	4.10	815.00	3,341.50
08/10/2023		Prepare service of complaint, TRO motion, related filings, and TRO order to occupant at Mahwah	1.60	815.00	1,304.00

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08/10/2023	NAB	Correspond with W. Farmer, A. Luft regarding preparations for preliminary injunction hearing (.4); analyze strategy for same in light of no objections to relief sought (.3); call with S. Maza, P. Linsey (NPM), A. Luft regarding same (.5); follow-up call with S. Maza regarding same (.2); correspond with D. Barron regarding same (.1); correspond with L. Despins regarding same (.2); review and revise draft request for status conference (.3); correspond with P. Linsey regarding same (.2)	2.20	1,625.00	3,575.00
08/10/2023	SM29	Call with A. Luft, N. Bassett re preliminary injunction hearing prep (.5); call with N. Bassett re same and TRO order (.2)	0.70	1,320.00	924.00
08/10/2023	SM29	Review emails from and P. Linsey (NPM) re service issues and applicable state law (.4); analyze same (4.6); correspond with , W. Farmer, N. Bassett, P. Linsey re same (.3)	5.30	1,320.00	6,996.00
08/10/2023	WCF	Analyze authorities regarding service under Nevada law (.6); correspond with regarding same (.2)	0.80	1,235.00	988.00
08/11/2023	DEB4	Correspond with J. Kuo regarding rule 9019 motion	0.10	1,320.00	132.00
08/11/2023	ECS1	Review and comment on service of notice in Mahwah adversary proceeding	0.40	1,015.00	406.00
08/11/2023	JK21	Revise rule 9019 motion	0.10	540.00	54.00
08/11/2023	AEL2	Call with N. Bassett re: Mahwah hearing plans	0.60	1,625.00	975.00
08/11/2023		Prepare draft certificates of service	1.20	815.00	978.00
08/11/2023		Prepare exhibit list and exhibits for Mahwah preliminary injunction hearing	5.50	815.00	4,482.50

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08/11/2023	NAB	Prepare for preliminary injunction hearing by reviewing exhibits and analyzing evidentiary issues (3.1); correspond with W. Farmer, A. Luft regarding same (.2); call with A. Luft regarding same (.6); further correspond with W. Farmer regarding same (.2); correspond with L. Despins regarding same (.1); call with counsel to Taurus Fund regarding preliminary injunction hearing (.2); review authority and prepare outline for same (1.9)	6.30	1,625.00	10,237.50
08/11/2023	SM29	Correspond with re service issues and certificate of service	0.90	1,320.00	1,188.00
08/11/2023	WCF	Draft UnitedLex forensic data expert declaration regarding authentication of internet content including videos (4.1); analyze prior preliminary injunction hearing testimony of expert regarding same (1.8)	5.90	1,235.00	7,286.50
08/12/2023	DEB4	Correspond with L. Despins regarding DOJ comments to rule 9019 motion	0.50	1,320.00	660.00
08/12/2023	DEB4	Further correspond with L. Despins regarding rule 9019 motion (0.1); correspond with S. Sarnoff (OMM) regarding same (0.1); correspond with I. Goldman (Pullman) regarding same (0.1)	0.30	1,320.00	396.00
08/12/2023		Prepare revised draft certificates of service	1.00	815.00	815.00
08/12/2023		Prepare exhibits and exhibit list for preliminary injunction hearing	5.50	815.00	4,482.50
08/12/2023		Review Saturday NFSC live stream in Mahwah	1.00	815.00	815.00
08/12/2023	NAB	Correspond with L. Despins regarding preparations for preliminary injunction hearing	0.50	1,625.00	812.50

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08/12/2023	WCF	Review and revise list of exhibits for Mahwah preliminary injunction trial (.4); correspond with regarding same (.8); call with M. Luther (UnitedLex) regarding forensic data declaration (.4); continue to draft UnitedLex authentication declaration regarding revised video and internet content exhibits and evidence (4.5)	6.10	1,235.00	7,533.50
08/13/2023	DEB4	Conference with L. Despins, , A. Luft, and N. Bassett regarding Mahwah hearing prep	1.00	1,320.00	1,320.00
08/13/2023	DEB4	Conferences with regarding hearing prep	0.30	1,320.00	396.00
08/13/2023	LAD4	Call with N. Bassett, , A. Luft, D. Barron re: prep for Mahwah hearing (1.00); review/comment all day on exhibits issues (4.30)	5.30	1,860.00	9,858.00
08/13/2023	AEL2	Draft Mahwah hearing closing argument (3.7); conference with L. Despins, N. Bassett, D. Barron, and regarding evidentiary issues and hearing prep (1.0); call with W. Farmer and regarding direct examination of J. Monzon (.4)	5.10	1,625.00	8,287.50
08/13/2023		Conference with L. Despins, N. Bassett, A. Luft, D. Barron on the Mahwah preliminary injunction hearing prep	1.00	815.00	815.00

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08/13/2023		Call with S. Maza regarding certificate of service and Mahwah preliminary injunction hearing prep (.2); calls with D. Barron regarding preliminary injunction hearing prep (.3); call with A. Luft and W. Farmer regarding direct examination of J. Monzon (.4); calls and correspond with N. Bassett regarding exhibits and exhibit list for Mahwah preliminary injunction hearing (.3); review PI/TRO documents for Mahwah hearing (1.6); prepare exhibits and exhibit list for Mahwah hearing (6.2); further correspond with N. Bassett regarding same and evidentiary issues (.1); analyze exhibits in connection with evidentiary issues (.4)	9.50	815.00	7,742.50
08/13/2023		Conference with UnitedLex on declaration about preserving media posts	1.00	815.00	815.00
08/13/2023	NAB	Email L. Despins, A. Luft, W. Farmer, and regarding preparations for preliminary injunction hearing (.4); call with L. Despins, D. Barron, A. Luft, and regarding same (1.0); call with W. Farmer and potential UnitedLex witness regarding testimony preparations (.7); prepare hearing outlines for direct examination, introduction of exhibits, and argument (2.2); review exhibits and draft exhibit list (1.5); correspond and calls with regarding same (.3)	6.10	1,625.00	9,912.50
08/13/2023	SM29	Call with re certificate of service and PI trial prep (.2); review same (.1); correspond with N. Bassett, , A. Luft, and W. Farmer re preliminary injunction hearing prep and exhibits list (.6)	0.90	1,320.00	1,188.00

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08/13/2023	WCF	Call with N. Bassett, UnitedLex regarding J. Monzon expert authentication declaration (.7); follow up call with A. Luft and regarding direct examination of J. Monzon (.4); revise J. Monzon declaration regarding same (1.0); review and revise exhibit list for preliminary injunction hearing (.8); correspond with regarding same (.2)	3.10	1,235.00	3,828.50
08/14/2023	DEB4	Correspond with E. Elliot regarding Taurus entities	0.10	1,320.00	132.00
08/14/2023	DEB4	Revise rule 9019 motion	0.20	1,320.00	264.00
08/14/2023	DEB4	Revise motion to limit notice regarding rule 9019 motion	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with L. Despins regarding motion to limit notice regarding rule 9019 motion	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with P. Linsey (NPM) regarding motion to limit notice regarding rule 9019 motion	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with P. Parizek (Kroll) regarding Taurus S.A.	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with J. Kuo regarding rule 9019 motion	0.20	1,320.00	264.00
08/14/2023	DEB4	Correspond with regarding David Fallon	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with J. Murray (DOJ) regarding rule 9019 motion	0.10	1,320.00	132.00
08/14/2023	DEB4	Correspond with L. Despins regarding rule 9019 motion	0.20	1,320.00	264.00
08/14/2023	DEB4	Correspond with J. Murray (DOJ) regarding motion to limit service regarding rule 9019 motion	0.10	1,320.00	132.00
08/14/2023	DEB4	Conferences with S. Maza regarding motion to limit notice regarding rule 9019 motion	0.30	1,320.00	396.00
08/14/2023	DEB4	Correspond with research services regarding Taurus S.A.	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2023	DEB4	Correspond with L. Despins regarding PI hearing	0.20	1,320.00	264.00
08/14/2023	DEB4	Conference with A. Luft regarding Mahwah TRO	0.40	1,320.00	528.00
08/14/2023	ECS1	Review and comment on service of rule 9019 motion and motion to limit notice in Mahwah AP (.3); correspond with J. Kuo and D. Barron regarding same (.2); review rule 9019 motion and motion to limit notice (.1)	0.60	1,015.00	609.00
08/14/2023	ECS1	Prepare supplemental affidavit of service and certificates of service re summons, complaint, and TRO in Mahwah adversary proceeding	0.80	1,015.00	812.00
08/14/2023	JK21	Prepare rule 9019 motion for electronic filing (0.3); electronically file with the court rule 9019 motion (0.4); electronically file with the court certificates of service regarding complaint, summons, and temporary restraining order (0.3); review and arrange for service of rule 9019 motion (0.2)	1.20	540.00	648.00
08/14/2023	JK21	Prepare motion to limit notice of rule 9019 motion for electronic filing (0.3); electronically file with the court motion to limit notice of rule 9019 motion (0.4); review and arrange for service of motion to limit notice (0.2)	0.90	540.00	486.00
08/14/2023	AEL2	Call with D. Barron regarding Mahwah TRO (.4); review submissions and exhibits in preparation for Mahwah preliminary injunction hearing (2.3); prepare hearing notes regarding same (.4)	3.10	1,625.00	5,037.50
08/14/2023		Prepare exhibits and video exhibits for Mahwah PI hearing	4.10	815.00	3,341.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2023	NAB	Prepare outline for direct testimony for preliminary injunction hearing (1.9); review documents and prepare outline for witness prep (1.4); review and prepare notes regarding exhibits and evidentiary matters for PI hearing (1.7)	5.00	1,625.00	8,125.00
08/14/2023	SM29	Finalize certificates of service (.2); review and revise motion to limit service re rule 9019 motion (.5); calls with D. Barron re same (.3)	1.00	1,320.00	1,320.00
08/15/2023	DEB4	Conference with regarding Mahwah order	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with E. Sutton regarding service of rule 9019 motion	0.20	1,320.00	264.00
08/15/2023	DEB4	Correspond with and S. Maza regarding order extending TRO	0.20	1,320.00	264.00
08/15/2023	ECS1	Prepare certificate of service regarding consensual motion to extend date to respond to motion to clarify TRO (.7); review consensual motion to clarify TRO (.1)	0.80	1,015.00	812.00
08/15/2023	ECS1	Prepare certificate of service in connection with Mahwah rule 9019 motion and motion to limit service	0.90	1,015.00	913.50
08/15/2023	JK21	Prepare certificate of service regarding rule 9019 motion for electronic filing (0.2); electronically file with the court certificate of service regarding rule 9019 motion (0.2)	0.40	540.00	216.00
08/15/2023	JK21	Prepare for electronic filing certificate of service regarding order extending temporary restraining order (0.2); electronically file with the court certificate of service regarding order extending temporary restraining order (0.2)	0.40	540.00	216.00
08/15/2023		Analyze application of Nevada LLC statute on reinstatement of LLC	0.40	815.00	326.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/2023		Call with D. Barron regarding order extending TRO (.1); review and comment on service of order extending TRO on Scott Barnett and prepare certificate of service regarding same (1.8)	1.90	815.00	1,548.50
08/15/2023	NAB	Correspond with regarding letter from opposing counsel	0.20	1,625.00	325.00
08/15/2023	WCF	Analyze court order regarding preliminary injunction	0.10	1,235.00	123.50
08/16/2023		Prepare notice of filing of affidavit of service	0.40	815.00	326.00
08/16/2023	SM29	Review and revise certificate of service from in connection with extended TRO order	0.20	1,320.00	264.00
08/18/2023	DEB4	Further conference with E. Sutton regarding sealing motion (0.1); revise same (0.2); correspond with E. Henzy (Zeisler) regarding same (0.1)	0.40	1,320.00	528.00
08/18/2023	DEB4	Correspond with L. Despins regarding sealing motion (0.1); conference with E. Sutton regarding same (0.1)	0.20	1,320.00	264.00
08/18/2023	ECS1	Prepare joint motion with Debtor to seal certain exhibits in the Mahwah adversary proceeding (1.8); calls with D. Barron regarding same (.2); correspond with D. Barron regarding same (.1)	2.10	1,015.00	2,131.50
08/18/2023	JK21	Correspond with E. Sutton regarding joint motion with Debtors for sealing	0.30	540.00	162.00
08/20/2023		Review NFSC live streaming in Mahwah	0.90	815.00	733.50
08/20/2023	NAB	Review statement of defendant in Mahwah litigation regarding ownership of assets	0.20	1,625.00	325.00
08/20/2023	SM29	Review list of assets from Taurus fund	0.20	1,320.00	264.00
08/21/2023	ECS1	Review and comment on service of order limiting service of rule 9019 motion in Mahwah adversary proceeding (.2); prepare certificate of service regarding same (.4)	0.60	1,015.00	609.00

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08/21/2023	JK21	Prepare certificate of service regarding order to limit notice of rule 9019 motion with the United States	0.60	540.00	324.00
08/22/2023	ECS1	Prepare outline of Mahwah discovery plan (1.6); discussion with S. Maza regarding same (.5); correspond with regarding same (.3)	2.40	1,015.00	2,436.00
08/22/2023	ECS1	Prepare certificate of service of order limiting service of rule 9019 motion in Mahwah adversary proceeding	0.10	1,015.00	101.50
08/22/2023	JK21	Electronically file with the court certificate of service regarding order to limit notice of rule 9019 motion with the United States	0.40	540.00	216.00
08/22/2023	SM29	Conference with E. Sutton re Mahwah discovery items and strategy	0.50	1,320.00	660.00
08/23/2023	ECS1	Continue preparing outline of Mahwah discovery plan (.9); correspond with S. Maza regarding same (.1); call with K. Liu (Research Services) regarding same (.2)	1.20	1,015.00	1,218.00
08/24/2023	DEB4	Analyze preliminary injunction decision (0.3); conference with S. Maza regarding same (0.1); correspond with L. Despins regarding same (0.1)	0.50	1,320.00	660.00
08/24/2023	ECS1	Continue outlining Mahwah discovery plan (.3); correspond with S. Maza and A. Luft regarding same (.1)	0.40	1,015.00	406.00
08/24/2023	LAD4	Review court's opinion on preliminary injunction (.70); t/c S. Sarnoff (OMM) (2X) re: same (.50); review/comment on implementation of PI order (.80)	2.00	1,860.00	3,720.00
08/24/2023	AEL2	Review preliminary injunction decision	0.40	1,625.00	650.00
08/24/2023		Review Mahwah preliminary injunction decision	0.40	815.00	326.00
08/24/2023		Comment on and arrange for service of preliminary injunction decision on Scott Barnett	0.20	815.00	163.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	NAB	Review decision granting preliminary injunction (.4); correspond with L. Despins regarding same (.3); consider issues related to implementation of order (.2)	0.90	1,625.00	1,462.50
08/24/2023	SM29	Review preliminary injunction opinion (.4); conference with D. Barron re same and next steps (.1); correspond with D. Barron re same and next steps (.1); review discovery plan from E. Sutton (.2); correspond with E. Sutton re same (.1)	0.90	1,320.00	1,188.00
08/24/2023	WCF	Analyze Defendants' inventory report and USMS vendor list regarding enforcement of preliminary injunction order (.4); draft action items regarding enforcement of preliminary injunction order (.6); correspond with L. Despins regarding same (.1)	1.10	1,235.00	1,358.50
08/25/2023	DEB4	Correspond with L. Despins regarding objection to rule 9019 motion (0.1); correspond with J. Murray (DOJ) regarding same (0.1)	0.20	1,320.00	264.00
08/25/2023	JK21	Prepare certificate of service regarding decision and order on preliminary injunction on S. Barnett (0.7); electronically file with the court certificate of service regarding decision and order on preliminary injunction on S. Barnett (0.2)	0.90	540.00	486.00
08/25/2023	LAD4	Review to do list from PI order (1.10); t/c W. Farmer and M. Conway (counsel to Taurus Fund) re: Mahwah preliminary injunction order (.30); review Taurus objection to DOJ settlement & prepare response (1.70)	3.10	1,860.00	5,766.00
08/25/2023		Prepare certificate of service of preliminary injunction decision on S. Barnett	0.60	815.00	489.00
08/25/2023	WCF	Call with L. Despins and counsel to Taurus Fund (S. Barnett) regarding Mahwah preliminary injunction order implementation	0.30	1,235.00	370.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	WCF	Further draft Mahwah preliminary injunction action items regarding vendors, task list, and enforcement issues	0.60	1,235.00	741.00
08/26/2023		Review the weekly NFSC live streaming in the Mahwah mansion	0.90	815.00	733.50
08/26/2023	NAB	Correspond with L. Despins regarding enforcement of preliminary injunction	0.20	1,625.00	325.00
08/27/2023	DEB4	Correspond with O'Melveny and L. Goldman regarding objection to rule 9019 motion	0.10	1,320.00	132.00
08/28/2023	DEB4	Conference with J. Murray (DOJ), L. Despins, and N. Bassett regarding rule 9019 hearing	0.30	1,320.00	396.00
08/28/2023	DEB4	Correspond with L. Despins regarding Mahwah insurance	0.10	1,320.00	132.00
08/28/2023	LAD4	T/c J. Murray & J. Feinstein (DOJ), N. Bassett and D. Barron re: Taurus objection to settlement agreement	0.30	1,860.00	558.00
08/28/2023	NAB	Call with Department of Justice, L. Despins and D. Barron regarding litigation issues	0.30	1,625.00	487.50
08/28/2023	SM29	Review objection to rule 9019 motion re U.S. Government settlement (.3); correspond with D. Barron re same (.1)	0.40	1,320.00	528.00
08/29/2023	DEB4	Correspond with and S. Maza regarding Taurus org chart	0.40	1,320.00	528.00
08/29/2023		Prepare organization chart for Taurus entities	1.30	815.00	1,059.50
08/29/2023	NAB	Call with L. Despins regarding preparation for hearing on, among other things, DOJ settlement and most recent Rule 2004 motion (.2); call with L. Despins regarding results of same (.3); correspond with P. Linsey and A. Luft regarding same (.1)	0.60	1,625.00	975.00
08/29/2023	SM29	Correspond with L. Despins re Taurus entities and affiliates (.1); correspond with and D. Barron re same (.1); review related chart from (.1)	0.30	1,320.00	396.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/30/2023	DEB4	Correspond with L. Despins regarding rule 9019 order (0.4); correspond with L. Despins and N. Bassett regarding discovery (0.3); correspond with P. Linsey regarding rule 9019 order (0.3); correspond with M. Conway regarding rule 9019 order (0.3); analyze same (0.4)	1.70	1,320.00	2,244.00
08/30/2023	ECS1	Prepare notice of revised order in Mahwah adversary proceeding	0.50	1,015.00	507.50
08/30/2023	JPK1	Correspond with D. Barron regarding timing of Rule 45 subpoena	0.30	915.00	274.50
08/30/2023	LAD4	Review Kwok Mahwah docs (1.20); review/edit competing orders for DOJ settlement (1.20)	2.40	1,860.00	4,464.00
08/30/2023		Review Mahwah memo and voice recording provided by informant	0.60	815.00	489.00
08/31/2023	DEB4	Correspond with regarding security services contract (0.1); correspond with L. Despins regarding modification to preliminary injunction order (0.1)	0.20	1,320.00	264.00
08/31/2023	LAD4	Review/comment on security services agreement (2.00); negotiations with Hawk Eye re: same (0.5); interview head of security (0.7)	3.20	1,860.00	5,952.00
08/31/2023		Review documents and information about Qi Yong at Taurus Management LLC	1.10	815.00	896.50
08/31/2023		Prepare glossary of Mahwah fixtures and personalty	1.90	815.00	1,548.50
Subtotal: B191 General Litigation			205.20		254,276.50

B195 Non-Working Travel

08/14/2023	LAD4	Travel to/from Bridgeport for hearing (Bill at 1/2 rate)	1.10	930.00	1,023.00
08/14/2023	AEL2	Travel back to NY from Court (Bridgeport, CT) (Bill at 1/2 rate)	2.30	812.50	1,868.75

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2023	AEL2	Travel from NY to Court (Bridgeport, CT) (Bill at 1/2 rate)	2.30	812.50	1,868.75
08/14/2023		Travel from New York to Bridgeport, Connecticut, and back from Bridgeport to New York for PI hearing (Bill at 1/2 rate)	3.50	407.50	1,426.25
08/14/2023	NAB	Non-working travel from Norfolk to Bridgeport and back for preliminary injunction hearing in Mahwah adversary proceeding (Bill at 1/2 rate)	5.60	812.50	4,550.00
08/29/2023	LAD4	Travel to/from Bridgeport for hearing (Bill at 1/2 rate)	1.20	930.00	1,116.00
Subtotal: B195 Non-Working Travel			16.00		11,852.75
Total			252.30		313,918.75

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	33.40	1,860.00	62,124.00
LAD4	Luc A. Despins	Partner	2.30	930.00	2,139.00
NAB	Nicholas A. Bassett	Partner	32.50	1,625.00	52,812.50
NAB	Nicholas A. Bassett	Partner	5.60	812.50	4,550.00
AEL2	Luft, Avi E.	Of Counsel	22.80	1,625.00	37,050.00
AEL2	Luft, Avi E.	Of Counsel	4.60	812.50	3,737.50
SM29	Shlomo Maza	Associate	13.80	1,320.00	18,216.00
DEB4	Douglass E. Barron	Associate	25.50	1,320.00	33,660.00
WCF	Will C. Farmer	Associate	20.70	1,235.00	25,564.50
ECS1	Ezra C. Sutton	Associate	13.50	1,015.00	13,702.50
JPK1	Jon P. Kosciwicz	Associate	0.30	915.00	274.50
		Associate	68.40	815.00	55,746.00
		Associate	3.50	407.50	1,426.25
JK21	Jocelyn Kuo	Paralegal	5.40	540.00	2,916.00

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Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	Photocopy Charges	4,380.00	0.08	350.40
08/08/2023	Photocopy Charges	32.00	0.08	2.56
08/08/2023	Photocopy Charges	32.00	0.08	2.56
08/10/2023	Photocopy Charges	495.00	0.08	39.60
08/11/2023	Photocopy Charges	36.00	0.08	2.88
08/12/2023	Photocopy Charges	488.00	0.08	39.04
08/12/2023	Photocopy Charges (Color)	287.00	0.20	57.40
08/15/2023	Photocopy Charges	16.00	0.08	1.28
08/21/2023	Photocopy Charges	15.00	0.08	1.20
08/24/2023	Photocopy Charges	100.00	0.08	8.00
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Scott Barnett; 6628 Sky Pointe Dr Ste 129-1071; Las Vegas, NV 891314076 ; 1ZA6T1630194778932 (MAN)			24.67
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Taurus Management LLC; 6628 Sky Pointe Dr Ste 129- 1071; Las Vegas, NV 891314076 ; 1ZA6T1630190025921 (MAN)			24.67
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Taurus Fund LLC c/o GG Internationa; 6628 Sky Pointe Dr. Ste 129;; Las Vegas, NV 891314076 ; 1ZA6T1630198440824 (MAN)			24.67
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Taurus MGNT.ON LLC c/o Corporation; 110 E. Broadway St.; Hobbs, NM 882408424 ; 1ZA6T1630198899447 (MAN)			28.06

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08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630193565342 (MAN)	30.53
08/01/2023	Electronic Document Retrieval - TransUnion Risk and Alternative Data Solutions, Inc., Invoice# 1047352-202307-1 Dated 08/01/23, TLO Charges for July 01, 2023 - July 31, 2023 - TruLookup Property Deed Search - Advanced	5.00
08/01/2023	Postage/Express Mail - First Class - US;	6.75
08/02/2023	Computer Search (Other)	0.18
08/03/2023	Computer Search (Other)	0.63
08/04/2023	Computer Search (Other)	1.17
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; ; Taurus Management LLC; 6628 Sky Pointe Dr.; Las Vegas, NV 89131 ; 1ZA6T1632490561559 (MAN)	4.08
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; Taurus Fund LLC; c/o GG International; 6628 Sky Pointe Dr.; Las Vegas, NV 89131 ; 1ZA6T1632492289743 (MAN)	4.08
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; ; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1632493058768 (MAN)	42.34
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; ; Taurus Management LLC; 6628 Sky Pointe Dr.; Las Vegas, NV 891314076 ; 1ZA6T1632490561559 (MAN)	52.12
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; Taurus Fund LLC; c/o GG International; 6628 Sky Pointe Dr.; Las Vegas, NV 891314076 ; 1ZA6T1632492289743 (MAN)	52.12

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08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; ; Scott Barnett; 6628 Sky Pointe Dr Ste 129-1071; Las Vegas, NV 891314076 ; 1ZA6T1632496063532 (MAN)	56.20
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; Taurus Management LL; c/o Corporation Service Company; 110 E. Broadway St.; Hobbs, NM 882408424 ; 1ZA6T1632496116127 (MAN)	58.85
08/07/2023	Postage/Express Mail - Priority Mail;	10.45
08/07/2023	Postage/Express Mail - Priority Mail;	18.95
08/07/2023	Postage/Express Mail - Priority Mail;	67.35
08/07/2023	Computer Search (Other)	1.80
08/09/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/09/2023; ; NA; 6628 SKY POINTE DR; LAS VEGAS, NV 89131 ; 1ZA6T1631290561554 (MAN)	2.82
08/09/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/09/2023; ; NA; 6628 SKY POINTE DR; LAS VEGAS, NV 89131 ; 1ZA6T1631290561554 (MAN)	20.14
08/09/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/09/2023; ; NA; 6628 SKY POINTE DR; LAS VEGAS, NV 89131 ; 1ZA6T1631296063537 (MAN)	22.96
08/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/10/2023; TAURUS FUND LLC; NA; 6628 SKY POINTE DR; LAS VEGAS, NV 89131 ; 1ZA6T1631292289748 (MAN)	2.82
08/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/10/2023; TAURUS FUND LLC; NA; 6628 SKY POINTE DR; LAS VEGAS, NV 89131 ; 1ZA6T1631292289748 (MAN)	20.14

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08/10/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/10/2023; ; Any Occupant; 675 Ramapo Valley Road; Mahwah, NJ 074302403 ; 1ZA6T1632493244520 (MAN)	42.34
08/10/2023	Lexis/On Line Search	33.33
08/10/2023	Postage/Express Mail - Priority Mail;	10.45
08/10/2023	Computer Search (Other)	0.54
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Linwan "Irene" Feng; One Gateway Center; Newark, NJ 071025323 ; 1ZA6T1630192301780 (MAN)	28.15
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Taurus Management LLC; 110 E. Broadway St.; Hobbs, NM 882408424 ; 1ZA6T1630193504998 (MAN)	28.29
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; GS Security Solutions Inc.; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630194136090 (MAN)	34.95
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Linwan "Irene" Feng; 1100 Frank E Rodgers Blvd S; Harrison, NJ 070292429 ; 1ZA6T1632490989777 (MAN)	42.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Joshua I. Sherman; 10 Mohawk Drive; Livingston, NJ 070393112 ; 1ZA6T1632494570729 (MAN)	42.34
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/11/2023; ; Taurus Fund LLC; 6628 Sky Pointe Dr. Ste 129; Las Vegas, NV 891314076 ; 1ZA6T1634492776965 (MAN)	43.47
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/11/2023; ; Taurus Management LLC; 6628 Sky Pointe Dr. Ste 129- 1071; LAS VEGAS, NV 891314076 ; 1ZA6T1634499630715 (MAN)	43.47

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; 17 Miles, LLC; 2510 East Sunset Road; Las Vegas, NV 891203500 ; 1ZA6T1630191453047 (MAN)	44.74
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/11/2023; ; SCOTT BARNETT; 218 ELSIE AVE.; MERRICK, NY 115663022 ; 1ZA6T1634498466324 (MAN)	49.39
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; Lura Barua; 17 Miles, LLC; 6628 Skye Pointe Drive, Suite 129; Las Vegas, NV 891314076 ; 1ZA6T1632499397999 (MAN)	52.12
08/11/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/11/2023; ; Zhuoer "Joe" Wang; 8340 Bryn Glen Way; San Diego, CA 921294467 ; 1ZA6T1632493468637 (MAN)	58.92
08/13/2023	Computer Search (Other)	3.60
08/14/2023	Computer Search (Other)	3.42
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; ; Scott Barnett; 6628 Sky Pointe Dr; Las Vegas, NV 891314076 ; 1ZA6T1630198459118 (MAN)	25.08
08/15/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163333; 08/15/2023; ; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630192022466 (MAN)	31.05
08/15/2023	Postage/Express Mail - First Class - US;	2.70
08/16/2023	Taxi/Ground Transportation - ; 08/14/2023; From/To: from PH office to Bridgeport, Connecticut; Service Type: Lyft; Travel from PH office to Bridgeport, Connecticut for Mahwah PI hearing	187.89
08/16/2023	Taxi/Ground Transportation - ; 08/14/2023; From/To: from PH office to my residence; Service Type: Lyft; Travel from PH office back home at 1AM on Monday	22.99

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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08/16/2023	Taxi/Ground Transportation - ; 08/14/2023; From/To: from Brooklyn to my residence; Service Type: Lyft; Travel from Brooklyn to my residence after Mahwah PI hearing ended	36.77
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; c/o The Corporation; Golden Spring (New York) Ltd.; 1209 Orange St.; Wilmington, DE 198011120 ; 1ZA6T1630192581844 (MAN)	24.29
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; c/o CT Corporation S; Golden Spring (New York) Ltd.; 28 Liberty St.; New York, NY 100051400 ; 1ZA6T1630193085432 (MAN)	24.29
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; c/o GG International; Taurus Fund LLC; 6628 Sky Pointe Dr. Ste 129; Las Vegas, NV 891314076 ; 1ZA6T1630190076813 (MAN)	25.18
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; Taurus Management LL; Taurus Management LLC; 6628 Sky Pointe Dr. Ste 129-1071; Las Vegas, NV 891314076 ; 1ZA6T1630195395488 (MAN)	25.18
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; Scott Barnett; Scott Barnett; 6628 Sky Pointe Dr. Ste 129- 1071; Las Vegas, NV 891314076 ; 1ZA6T1630198475690 (MAN)	25.18
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; c/o Corporation Serv; Taurus Management LLC; 110 E. Broadway St.; Hobbs, NM 882408424 ; 1ZA6T1630197567075 (MAN)	28.64
08/21/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/21/2023; Scott Barnett; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630193022428 (MAN)	31.17

Luc Despina as Chapter 11 Trustee in the case of Ho Wan
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08/21/2023	Postage/Express Mail - First Class - US;	14.85
08/21/2023	Postage/Express Mail - International;	3.00
08/21/2023	Computer Search (Other)	2.34
08/22/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/22/2023; CHINA GOLDEN SPRING; EASYCORP NOMINEE LIMITED; 18 LUARD ROAD; WAN CHAI, 49000 ; 1ZA6T1636696367519 (MAN)	54.08
08/22/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/22/2023; MAJESTIC VIEW MANOR; CHINA GOLDEN SPRING GROUP HK LTD; 20-22 SOUTH BAY ROAD; REPULSE BAY, 54000 ; 1ZA6T1636695371702 (MAN)	54.08
08/23/2023	Airfare - Nick Bassett; 08/11/2023; Roundtrip; From/To: Norfolk/LGA; Airfare Class: Economy; Travel to NY/CT to meet with client	1,127.81
08/23/2023	Travel Expense - Meals - Nick Bassett; 08/14/2023; Restaurant: Kavaldi; City: New York; Breakfast_ Number of people: 1; Travel to NY/CT to meet with client	13.91
08/23/2023	Travel Expense - Meals - Nick Bassett; 08/14/2023; Restaurant: LGA Micasa; City: New York; Dinner; Number of people: 1; Travel to NY/CT to meet with client	40.19
08/23/2023	Taxi/Ground Transportation - Nick Bassett; 08/14/2023; From/To: CT/LGA; Service Type: Uber; Travel to NY/CT to meet with client	114.95
08/23/2023	Taxi/Ground Transportation - Nick Bassett; 08/14/2023; From/To: LGA/CT; Service Type: Uber; Travel to NY/CT to meet with client	210.02
08/23/2023	Travel Expense - Parking - Nick Bassett; 08/14/2023; Travel to NY/CT to meet with client	24.00
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; ; Scott Barnett; 6628 Sky Pointe Dr; Las Vegas, NV 891314076 ; 1ZA6T1630194737066 (MAN)	25.18

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00012
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08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; ; Scott Barnett; 218 Elsie Ave; Merrick, NY 115663022 ; 1ZA6T1630196992376 (MAN)	31.17
08/24/2023	Postage/Express Mail - First Class - US;	3.66
Total Costs incurred and advanced		\$3,859.98
Current Fees and Costs		\$317,778.73
Total Balance Due - Due Upon Receipt		\$317,778.73



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371617

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Golden Spring Adversary Proceeding

PH LLP Client/Matter # 50687-00013

Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$17,394.00
Costs incurred and advanced	1,071.20
Current Fees and Costs Due	\$18,465.20
Total Balance Due - Due Upon Receipt	\$18,465.20

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371617

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Golden Spring Adversary Proceeding

PH LLP Client/Matter # 50687-00013

Luc A. Despins

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



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 t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371617

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Golden Spring Adversary Proceeding

\$17,394.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	DEB4	Correspond with E. Sutton regarding analysis of service issues	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with L. Despins regarding Hong Kong service issues	0.20	1,320.00	264.00
08/01/2023	DEB4	Conferences with E. Sutton regarding service of summons	0.30	1,320.00	396.00
08/01/2023	DEB4	Correspond with N. Bassett regarding service of summons	0.10	1,320.00	132.00
08/01/2023	ECS1	Review and comment on service of summons and complaint on Golden Spring and China Golden Spring (.4); calls with D. Barron about same (.3)	0.70	1,015.00	710.50
08/02/2023	JPK1	Draft subpoenas to Nicholas Savio (.5); draft requests for production of documents to Nicholas Savio (1.3); correspond with D. Barron regarding same (.4); correspond with W. Farmer regarding same (.1)	2.30	915.00	2,104.50
08/02/2023	JPK1	Correspond with A. Luft regarding complaint and summons (.5); correspond with D. Barron regarding the same (.3)	0.80	915.00	732.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2023	DEB4	Correspond with E. Sutton regarding service issues	0.10	1,320.00	132.00
08/04/2023	DEB4	Correspond with P. Linsey (NPM) regarding unsealing of docket	0.10	1,320.00	132.00
08/04/2023	ECS1	Review and comment on service of summons and complaint on Golden Spring and China Golden Spring	0.70	1,015.00	710.50
08/07/2023	DEB4	Conference with E. Sutton regarding Hong Kong service	0.10	1,320.00	132.00
08/07/2023	ECS1	Review and comment on service of summons and complaint on Golden Spring and China Golden Spring (.6); call with D. Barron regarding same (.1)	0.70	1,015.00	710.50
08/08/2023	JK21	Correspond with , S. Maza, and E. Sutton regarding issued summons and service of same	0.20	540.00	108.00
08/10/2023	ECS1	Prepare certificate of service for Golden Spring summons and complaint (1.3); correspond with D. Barron about same (.1); call with P. Linsey (NPM) regarding same (.1)	1.50	1,015.00	1,522.50
08/11/2023	DEB4	Correspond with E. Sutton regarding service issues	0.20	1,320.00	264.00
08/11/2023	DEB4	Correspond with P. Linsey (NPM) regarding sealing order	0.10	1,320.00	132.00
08/11/2023	DEB4	Call with E. Sutton regarding certificate of service	0.10	1,320.00	132.00
08/11/2023	ECS1	Prepare certificate of service for Golden Spring summons and complaint (.6); call with D. Barron about same (.1); calls with P. Linsey (NPM) regarding same (.2); correspond with L. Despins regarding same (.1)	1.00	1,015.00	1,015.00
08/14/2023	ECS1	Prepare parts of Rule 7012 motion to set answer deadline for China Golden Spring in Golden Spring adversary proceeding	2.60	1,015.00	2,639.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2023	ECS1	Prepare Rule 7012 motion to set answer deadline for China Golden Spring in Golden Spring adversary proceeding	0.70	1,015.00	710.50
08/18/2023	DEB4	Correspond with E. Sutton regarding rule 7012 motion (0.3); revise same (0.3); correspond with A. Luft regarding same (0.1)	0.70	1,320.00	924.00
08/18/2023	ECS1	Prepare Rule 7012 motion to set answer deadline for China Golden Spring in Golden Spring adversary proceeding	0.50	1,015.00	507.50
08/18/2023	JK21	Revise rule 7012 motion (0.2); electronically file with the court rule 7012 motion (0.3)	0.50	540.00	270.00
08/18/2023	AEL2	Revise Golden Spring HK foreign service motion	0.40	1,625.00	650.00
08/21/2023	ECS1	Review and comment on service of Rule 7012 motion on defendants	0.10	1,015.00	101.50
08/21/2023	JK21	Review and handle service of order limiting service of rule 7012 motion	0.30	540.00	162.00
08/22/2023	ECS1	Review Rule 7012 motion and related deadlines (.1); correspond with P. Linsey (NPM) regarding same (.1)	0.20	1,015.00	203.00
08/23/2023	ECS1	Review Rule 7012 motion and related deadlines (.2); correspond with P. Linsey (NPM) regarding same (.1)	0.30	1,015.00	304.50
08/23/2023	JK21	Correspond with E. Sutton regarding summons issued to Golden Spring	0.20	540.00	108.00
08/24/2023	DEB4	Correspond with E. Sutton regarding answer deadline	0.10	1,320.00	132.00
08/24/2023	ECS1	Review and comment on service of order regarding Rule 7012 motion and China Golden Spring answer deadline (.4); call with P. Linsey (NPM) regarding same (.1)	0.50	1,015.00	507.50
08/24/2023	JK21	Correspond with E. Sutton regarding order clarifying deadline to answer	0.20	540.00	108.00
08/28/2023	DEB4	Correspond with E. Sutton regarding service issues	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00013
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/2023	ECS1	Review certificate of service regarding service of court order regarding answer deadline in Golden Spring adversary proceeding (.1); correspond with J. Kuo regarding same (.1)	0.20	1,015.00	203.00
08/28/2023	JK21	Prepare certificate of service regarding order clarifying deadline (0.3); electronically file with the court certificate of service regarding order clarifying deadline (0.2)	0.50	540.00	270.00
Subtotal: B191 General Litigation			17.40		17,394.00
Total			17.40		17,394.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
AEL2	Luft, Avi E.	Of Counsel	0.40	1,625.00	650.00
DEB4	Douglass E. Barron	Associate	2.30	1,320.00	3,036.00
ECS1	Ezra C. Sutton	Associate	9.70	1,015.00	9,845.50
JPK1	Jon P. Kosciwicz	Associate	3.10	915.00	2,836.50
JK21	Jocelyn Kuo	Paralegal	1.90	540.00	1,026.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023	Photocopy Charges	1,492.00	0.08	119.36
08/07/2023	Photocopy Charges	746.00	0.08	59.68
08/23/2023	Photocopy Charges	40.00	0.08	3.20
08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Golden Spring (New York) Ltd.; 28 Liberty Street; New York, NY 100051400 ; 1ZA6T1630194412826 (MAN)			27.92

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
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08/01/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/01/2023; ; Golden Spring (New York) Ltd.; 1209 Orange St.; WILMINGTON, DE 198011120 ; 1ZA6T1630197544303 (MAN)	27.92
08/01/2023	Postage/Express Mail - Priority Mail;	13.15
08/01/2023	Postage/Express Mail - Priority Mail;	13.35
08/01/2023	Postage/Express Mail - Registered Mail;	267.00
08/02/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/02/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; NO. 22 SOUTH BAY ROAD; HONG KONG, 33900 ; 1ZA6T1636695775722 (MAN)	69.42
08/02/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/02/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; 1 GARDEN ROAD; CENTRAL, 35000 ; 1ZA6T1635491386057 (MAN)	69.42
08/02/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/02/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; NO. 28 QUEENS ROAD; CENTRAL, 35000 ; 1ZA6T1635496731138 (MAN)	69.42
08/02/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/02/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; 18 LUARD ROAD; WAN CHAI, 49000 ; 1ZA6T1635492484243 (MAN)	69.42
08/05/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/05/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; NO. 28 QUEENS ROAD; CENTRAL, 35000 ; 1ZA6T1635496731138 (MAN)	47.00
08/05/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/05/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; 18 LUARD ROAD; WAN CHAI, 49000 ; 1ZA6T1635492484243 (MAN)	47.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00013
Invoice No. 2371617

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08/05/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163313; 08/05/2023; CHINA GOLDEN SPRING; (HONG KONG) LIMITED; 1 GARDEN ROAD; CENTRAL, 35000 ; 1ZA6T1635491386057 (MAN)	47.00
08/07/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163323; 08/07/2023; FLOOR- 7/FSUITE- RM#B; EASYCORP NOMINEE LIMITED; 18 LUARD ROAD,ONE CAPITAL PLAC; WAN CHAI, HK 49000 ; 1ZA6T1635492484243 (MAN)	19.50
08/22/2023	Computer Search (Other)	0.72
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; c/o CT Corporation S; Golden Spring (New York) Ltd.; 28 Liberty St.; New York, NY 100051400 ; 1ZA6T1630199169902 (MAN)	24.29
08/24/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000A6T163343; 08/24/2023; ; Golden Spring (New York) Ltd.; 1209 Orange St.; WILMINGTON, DE 198011120 ; 1ZA6T1630195601718 (MAN)	24.29
08/24/2023	Postage/Express Mail - First Class - US;	3.18
08/24/2023	Postage/Express Mail - International;	48.96
Total Costs incurred and advanced		\$1,071.20
Current Fees and Costs		\$18,465.20
Total Balance Due - Due Upon Receipt		\$18,465.20



PAUL HASTINGS LLP
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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371618

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

HCHK Adversary Proceeding

PH LLP Client/Matter # 50687-00014
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$292,092.50
Costs incurred and advanced	470.28
Current Fees and Costs Due	\$292,562.78
Total Balance Due - Due Upon Receipt	\$292,562.78

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Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371618

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

HCHK Adversary Proceeding

PH LLP Client/Matter # 50687-00014
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$292,092.50
Costs incurred and advanced	470.28
Current Fees and Costs Due	\$292,562.78
Total Balance Due - Due Upon Receipt	\$292,562.78

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371618

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

HCHK Adversary Proceeding

\$292,092.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
08/08/2023	LAD4	T/c R. Jareck (Cole Schotz), D. Barron, N. Bassett re: status conference today (.40); review submissions and prepare outline for same (.40); handle same (.50); post-mortem N. Bassett re: same (.10)	1.40	1,860.00	2,604.00
08/08/2023	AEL2	Attend status conference regarding intervention (.5); call with D. Barron regarding same (.5)	1.00	1,625.00	1,625.00
08/08/2023	NAB	Participate in status conference regarding intervention (.5); follow-up call with L. Despins regarding same (.1)	0.60	1,625.00	975.00
08/14/2023	WCF	Draft talking points for status conferences in HCHK adversary proceeding (.3); review case docket and pleadings regarding same (.2)	0.50	1,235.00	617.50
08/15/2023	LAD4	Review submissions and prepare outline for hearing (.70); handle hearing re intervention discovery (2.50)	3.20	1,860.00	5,952.00
08/15/2023	AEL2	Review submissions and authority for hearing on intervention discovery	1.10	1,625.00	1,787.50

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Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/2023	AEL2	Participate in hearing re: intervention discovery	2.50	1,625.00	4,062.50
Subtotal: B155 Court Hearings			10.30		17,623.50

B191 General Litigation

08/01/2023	DEB4	Correspond with M. Tsukerman (CS) regarding motion to modify TRO	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with E. Sutton regarding HCHK documents from assignee (0.1); correspond with B. Goeller (DLA) regarding same (0.1); correspond with L. Despins and M. Tsukerman (CS) regarding J. Wang (0.1)	0.30	1,320.00	396.00
08/01/2023	DEB4	Correspond with A. Luft regarding HCHK discovery issues	0.10	1,320.00	132.00
08/01/2023	DEB4	Correspond with N. Bassett, P. Linsey (NPM) and W. Farmer regarding HCHK discovery	0.40	1,320.00	528.00
08/01/2023	AEL2	Correspond with L. Despins and N Bassett re: litigation hold notice re: HCHK assignee claims	0.20	1,625.00	325.00
08/01/2023	AEL2	Review Kwok testimony regarding HCHK for use in claims	0.30	1,625.00	487.50
08/01/2023	AEL2	Analyze and draft proposed discovery order for intervention	0.50	1,625.00	812.50
08/01/2023		Prepare draft proposed discovery scheduling order	1.00	815.00	815.00
08/01/2023	NAB	Correspond with L. Despins and A. Luft regarding litigation hold letter and review same (.3); analyze HCHK discovery issues (.2)	0.50	1,625.00	812.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	DEB4	Prepare parts of objection to motion to expedite motion to modify TRO (3.5); correspond with N. Bassett regarding discovery schedule issues (0.2); correspond with E. Sutton regarding rule 9019 order (0.1); analyze same (0.2); correspond with regarding informant allegations related to same (0.3); correspond with P. Linsey regarding motion for stay pending appeal (0.1)	4.40	1,320.00	5,808.00
08/02/2023	ECS1	Analyze rules regarding motions to expedite (.2); prepare objection to Himalaya parties' motion to expedite TRO motion (.3); correspond with D. Barron regarding same (.1)	0.60	1,015.00	609.00
08/02/2023	JK21	Correspond with J. Kosciwicz regarding rule 9019 pleadings	0.40	540.00	216.00
08/02/2023	LAD4	Review motion to expedite clarification of TRO (.40); revise and comment on same (.90); review/edit objection to motion to expedite (.40)	1.70	1,860.00	3,162.00
08/02/2023	AEL2	Analyze and edit HCHK intervention proposed discovery schedule	0.90	1,625.00	1,462.50
08/02/2023	AEL2	Analyze and comment on arguments for objection to motion to expedite	0.40	1,625.00	650.00
08/02/2023	AEL2	Analyze responses to HCHK motion to expedite	1.30	1,625.00	2,112.50
08/02/2023	AEL2	Correspond with D. Barron re: motion for stay pending appeal	0.30	1,625.00	487.50
08/02/2023	AEL2	Correspond with N. Bassett re: creditors proposed discovery order	0.20	1,625.00	325.00
08/02/2023	AEL2	Analyze and comment on arguments for G Club objection re: privilege and responsiveness	0.40	1,625.00	650.00
08/02/2023		Review bank transfers to HCHK sent from informant	0.30	815.00	244.50
08/02/2023		Review documents sent by informant in Tokyo on Japan Himalaya League	2.10	815.00	1,711.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	NAB	Review proposed discovery schedule (.2); correspond with W. Farmer and A. Luft regarding same (.2)	0.40	1,625.00	650.00
08/02/2023	NAB	Review and revise objection to motion to expedite motion to modify TRO (.4); correspond with D. Barron regarding same (.2)	0.60	1,625.00	975.00
08/03/2023	JPK1	Review pleadings concerning G Club Operations' notice regarding the Trustee's rule 9019 settlement agreement (1.1); review July 7, 2023 and July 18, 2023 transcripts concerning the same (.9)	2.00	915.00	1,830.00
08/03/2023	AEL2	Review proposed HCHK discovery schedule	0.30	1,625.00	487.50
08/03/2023		Review transfer summaries from Japan Farm to HCHK and additional Kwok-controlled entities	0.20	815.00	163.00
08/03/2023		Summarize Kwok affiliated entities and persons for forensic analysis by Kroll	1.40	815.00	1,141.00
08/03/2023	NAB	Review discovery requests concerning discovery of proposed intervenors (.3); participate in meet and confer call with proposed intervenors' counsel, W. Farmer regarding motion to intervene discovery schedule (.3); correspond with A. Luft regarding same (.1); review and revise proposed discovery schedule (.4); correspond with W. Farmer regarding same (.2)	1.30	1,625.00	2,112.50
08/03/2023	WCF	Call with N. Bassett, Pastore LLC regarding motion to intervene discovery schedule (.3); review, revise proposed scheduling order regarding discovery deadlines (.3)	0.60	1,235.00	741.00
08/04/2023	DEB4	Correspond with regarding HCHK related documents	0.50	1,320.00	660.00
08/04/2023	AEL2	Analyze investigative documents and issues re: intervenors	0.40	1,625.00	650.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2023		Review HCHK loan agreements, transfer spreadsheet, and bank transfer forms received to date	1.00	815.00	815.00
08/04/2023		Prepare summary of HCHK documents and loan agreements for Kroll	0.80	815.00	652.00
08/04/2023		Further prepare summary of Kwok affiliated persons and entities for Kroll forensic analysis	1.40	815.00	1,141.00
08/04/2023	NAB	Consider and prepare notes on HCHK discovery next steps (.2); review revisions to proposed discovery scheduling order (.2); correspond with P. Linsey (NPM) and W. Farmer regarding same (.1)	0.50	1,625.00	812.50
08/06/2023	JPK1	Draft parts of brief regarding G Club privilege waiver and inability to object to assignee's turnover of HCHK Technologies' corporate records	2.50	915.00	2,287.50
08/07/2023	DEB4	Conference with L. Despins, A. Luft and N. Bassett regarding HCHK issues	0.80	1,320.00	1,056.00
08/07/2023	DEB4	Analyze HCHK TRO-related pleadings	0.50	1,320.00	660.00
08/07/2023	DEB4	Correspond with L. Despins regarding TRO	0.10	1,320.00	132.00
08/07/2023	DEB4	Correspond with R. Jareck (CS) regarding status conference	0.10	1,320.00	132.00
08/07/2023	JPK1	Analyze Second Circuit law regarding waiver of attorney client privilege	1.40	915.00	1,281.00
08/07/2023	LAD4	Update/strategy call with N. Bassett, A. Luft, D. Barron	0.80	1,860.00	1,488.00
08/07/2023	AEL2	Meeting with L. Despins, D. Barron, and N. Bassett re: prep for HCHK status conference	0.80	1,625.00	1,300.00
08/07/2023		Correspond with informants in Tokyo on Shuai Guo and Japan Himalaya League	0.20	815.00	163.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	NAB	Review request for status conference (.1); correspond with P. Linsey (NPM) regarding same (.1); analyze HCHK TRO and discovery issues in connection with same (.2); call with A. Luft, L. Despins, and D. Barron regarding same (.8)	1.20	1,625.00	1,950.00
08/08/2023	DEB4	Correspond with L. Despins, A. Luft, and N. Bassett regarding HCHK investigation	0.10	1,320.00	132.00
08/08/2023	DEB4	Analyze intervenor pleadings	1.30	1,320.00	1,716.00
08/08/2023	DEB4	Correspond with M. Tsukerman (CS) regarding HCHK documents (0.1); correspond with S. Semaya (DLA) regarding same (0.1)	0.20	1,320.00	264.00
08/08/2023	DEB4	Conference with L. Despins, R. Jareck (CS), N. Bassett regarding HCHK strategy	0.40	1,320.00	528.00
08/08/2023	DEB4	Conference with A. Luft regarding HCHK status conference	0.50	1,320.00	660.00
08/08/2023	DEB4	Conference with P. Parizek (Kroll), , and A. Luft regarding HCHK issues regarding intervention and intervenor documents	0.40	1,320.00	528.00
08/08/2023	JPK1	Analyze New York debtor and creditor law regarding waiver of attorney client privilege in assignment proceedings (1.7); analyze Second Circuit law regarding waiver of attorney client privilege due to cloud computing and email hosting (.9); analyze additional Second Circuit case law regarding waiver of attorney client privilege (1.5); analyze Second Circuit case law regarding passage of attorney client privilege in entity asset sale (1.2); analyze Second Circuit case law regarding third party's ability to object to turnover of documents in New York state law assignment proceeding (.9)	6.20	915.00	5,673.00
08/08/2023	JPK1	Telephone conference with A. Luft regarding GTV Media/Saraca Media and G Club August 11, 2023 briefs	0.50	915.00	457.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/08/2023	AEL2	Analyze HCHK's objections and responses to discovery requests in connection with Trustee's response to same	0.80	1,625.00	1,300.00
08/08/2023	AEL2	Call with Kroll, , and D. Barron re: HCHK intervenor documents	0.40	1,625.00	650.00
08/08/2023	AEL2	Analyze economic argument regarding why intervenor theory fails	0.80	1,625.00	1,300.00
08/08/2023	AEL2	Prepare hearing notes for status conference on intervention	0.30	1,625.00	487.50
08/08/2023	AEL2	Call with J. Kosciwicz re: G Club response brief as to responsiveness and privilege	0.50	1,625.00	812.50
08/08/2023		Prepare information sheet on proposed intervenors	1.00	815.00	815.00
08/08/2023		Conference with Kroll, D. Barron and A. Luft on reviewing bank statements	0.40	815.00	326.00
08/08/2023	NAB	Call with L. Despins, assignee counsel, and D. Barron regarding TRO modification request and strategy for status conference (.4); prepare hearing notes for status conference (.3); review responses and objections to discovery requests (.3); correspond with A. Luft regarding same (.1)	1.10	1,625.00	1,787.50
08/09/2023	DEB4	Correspond with L. Despins regarding HCHK documents	0.10	1,320.00	132.00
08/09/2023	DEB4	Conferences with M. Tsukerman (CS) and R. Jareck (CS) regarding HCHK next steps	0.60	1,320.00	792.00
08/09/2023	DEB4	Analyze HCHK documents	0.50	1,320.00	660.00
08/09/2023	DEB4	Correspond with S. Semaya (DLA) regarding HCHK documents	0.20	1,320.00	264.00
08/09/2023	JPk1	Continue drafting argument section of G Club brief	3.20	915.00	2,928.00
08/09/2023	AEL2	Review open issues and notes in preparation for meet and confer re: intervention discovery	0.40	1,625.00	650.00
08/09/2023	AEL2	Outline objection plan for intervenor discovery	0.50	1,625.00	812.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/09/2023	AEL2	Meet and confer with HCHK counsel, N. Bassett, W. Farmer, and P. Linsey (NPM) regarding discovery disputes in HCHK adversary proceeding re: intervention objections	1.00	1,625.00	1,625.00
08/09/2023	AEL2	Meeting with W. Farmer and N. Bassett re: plan for HCHK discovery motion to compel	0.80	1,625.00	1,300.00
08/09/2023	NAB	Review proposed intervenor responses and objections to discovery requests (.2); call with HCHK counsel, A. Luft, and W. Farmer regarding same (1.0); follow-up call with A. Luft and W. Farmer regarding same (.8)	2.00	1,625.00	3,250.00
08/09/2023	WCF	Call with HCHK counsel, N. Bassett, A. Luft, and P. Linsey regarding discovery disputes in HCHK adversary proceeding (1.0); follow up call with A. Luft and N. Bassett regarding discovery issues with motion to intervene (.8); analyze intervention issues (.2); call with L. Miliotes regarding related case law (.1)	2.10	1,235.00	2,593.50
08/10/2023	DEB4	Correspond with T. Sadler regarding HCHK payroll	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with M. Tsukerman (CS) regarding HCHK documents	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with A. Luft regarding Gettr letter to assignee	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with A. Luft regarding motion to clarify TRO	0.40	1,320.00	528.00
08/10/2023	DEB4	Correspond with A. Luft and N. Bassett regarding motion to clarify TRO (0.3); analyze submissions and related documents regarding same (0.8)	1.10	1,320.00	1,452.00
08/10/2023	DEB4	Correspond with W. Farmer regarding HCHK discovery	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with M. Tsukerman (CS) regarding moving HCHK items	0.20	1,320.00	264.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/2023	DEB4	Correspond with A. Luft regarding pretrial conference	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with M. Tsukerman (CS) regarding HCHK payroll	0.20	1,320.00	264.00
08/10/2023	JPK1	Draft argument section of G Club response brief	2.40	915.00	2,196.00
08/10/2023	JPK1	Call with A. Luft regarding G Club response brief	0.80	915.00	732.00
08/10/2023	JPK1	Incorporate comments from A. Luft to G Club response brief (2.7); analyze Second Circuit case law regarding objecting to Rule 45 subpoenas (.4); analyze Second Circuit case law regarding the Kovel Doctrine (.8)	3.90	915.00	3,568.50
08/10/2023	JPK1	Revise preliminary statement in G Club response brief	0.50	915.00	457.50
08/10/2023	JPK1	Draft parts of motion to seal G Club brief	0.70	915.00	640.50
08/10/2023	AEL2	Correspond with R. Jareck (CS) re: facts related to HCHK documents in G Club dispute	0.50	1,625.00	812.50
08/10/2023	AEL2	Analyze and comment on arguments in draft G Club response brief	0.50	1,625.00	812.50
08/10/2023	AEL2	Correspond with N. Bassett and D. Barron re: motion to clarify TRO response	0.50	1,625.00	812.50
08/10/2023	AEL2	Call with J. Kosciwicz re: G Club response brief	0.80	1,625.00	1,300.00
08/10/2023	AEL2	Call with J. Temkin re: discovery from A. DiBattista	0.30	1,625.00	487.50
08/10/2023	AEL2	Review and revise G Club objection brief	4.10	1,625.00	6,662.50
08/10/2023	AEL2	Review revised clarification motion regarding TRO	0.20	1,625.00	325.00
08/11/2023	DEB4	Conference with E. Sutton regarding HCHK open issues/tasks	0.30	1,320.00	396.00
08/11/2023	DEB4	Correspond with regarding HCHK intervenor documents	0.10	1,320.00	132.00
08/11/2023	DEB4	Correspond with E. Sutton regarding HCHK documents	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/11/2023	DEB4	Correspond with N. Bassett and A. Luft regarding objection to motion to clarify TRO	0.10	1,320.00	132.00
08/11/2023	DEB4	Correspond with M. Tsukerman (CS) regarding HCHK payroll	0.20	1,320.00	264.00
08/11/2023	DEB4	Correspond with J. Kosciwicz regarding G Club privilege motion	0.10	1,320.00	132.00
08/11/2023	ECS1	Call with D. Barron re HCHK issues/task list and Cole Schotz' moving HCHK items	0.30	1,015.00	304.50
08/11/2023	JK21	Electronically file with the court memorandum of law in support of G Club documents argument (0.4); electronically file with the court motion to seal (0.3); review and comment on service of memorandum of law and motion to seal (0.2); electronically serve memorandum of law and motion to seal (0.2)	1.10	540.00	594.00
08/11/2023	JPK1	Prepare exhibits to G Club response brief	0.80	915.00	732.00
08/11/2023	JPK1	Review and revise G Club response brief	0.90	915.00	823.50
08/11/2023	JPK1	Draft parts of motion to seal G Club brief (.4); review and revise the same (.4)	0.80	915.00	732.00
08/11/2023	JPK1	Incorporate additional comments from A. Luft to G Club response brief	0.70	915.00	640.50
08/11/2023	JPK1	Correspond with J. Kuo regarding G Club response brief	0.10	915.00	91.50
08/11/2023	JPK1	Incorporate comments from L. Despins on the G Club response brief	0.30	915.00	274.50
08/11/2023	JPK1	Review edits from N. Bassett to G Club response brief (.6); review and revise G Club brief (.7)	1.30	915.00	1,189.50
08/11/2023	AEL2	Edit revised draft of G Club brief	1.70	1,625.00	2,762.50
08/11/2023	AEL2	Correspond with J. Kosciwicz re: edits to G Club brief and finalization of same	0.40	1,625.00	650.00
08/11/2023		Review corporate documents of HCHK intervenors to be sent to Kroll	0.50	815.00	407.50
08/12/2023	DEB4	Prepare objection to motion to clarify TRO	6.10	1,320.00	8,052.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2023	DEB4	Conference with T. Rutherford (Pastore) regarding extension of time to respond to motion to clarify TRO	0.20	1,320.00	264.00
08/14/2023	DEB4	Conference with P. Linsey (NPM) regarding motion to extend time to respond to motion to clarify TRO (0.1); review same (0.2)	0.30	1,320.00	396.00
08/14/2023	DEB4	Correspond with S. Maza regarding objection to motion to clarify TRO	0.50	1,320.00	660.00
08/14/2023	DEB4	Continue preparing objection to motion to clarify TRO	1.20	1,320.00	1,584.00
08/14/2023	DEB4	Correspond with A. Luft regarding objection to motion to clarify TRO	0.10	1,320.00	132.00
08/14/2023	DEB4	Conference with M. Tsukerman (CS), R. Jareck (CS), and E. Sutton regarding motion to clarify TRO and upcoming HCHK matters	0.60	1,320.00	792.00
08/14/2023	ECS1	Call with D. Barron, M. Tsukerman (Cole Schotz) and R. Jareck (Cole Schotz) re motion to clarify TRO and HCHK issues/tasks	0.60	1,015.00	609.00
08/14/2023	ECS1	Review consent motion to extend deadline to respond to motion to clarify TRO	0.10	1,015.00	101.50
08/14/2023	NAB	Correspond with A. Luft and L. Despins regarding next steps and preparation for status conference	0.20	1,625.00	325.00
08/14/2023	WCF	Draft motion to compel productions and depositions regarding motion to intervene and HCHK intervenor parties (3.4); analyze authorities regarding Rule 26 and Rule 45 motions to compel (1.7); further draft motion to compel and proposed order regarding intervenors' objections to discovery (1.1)	6.20	1,235.00	7,657.00
08/15/2023	DEB4	Correspond with J. Kuo regarding consent motion	0.20	1,320.00	264.00
08/15/2023	DEB4	Conference with P. Linsey (NPM) regarding consent motion	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/2023	DEB4	Correspond with P. Linsey (NPM) regarding motion to clarify TRO	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with P. Paritek (Kroll) regarding HCHK issues	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with A. Luft regarding HCHK discovery	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with T. Rutherford (Pastore) regarding consent motion	0.10	1,320.00	132.00
08/15/2023	DEB4	Revise consent motion	0.30	1,320.00	396.00
08/15/2023	DEB4	Correspond with P. Linsey (NPM) regarding status conference	0.10	1,320.00	132.00
08/15/2023	JK21	Prepare for electronic filing consent motion to extend time to respond to motion to clarify TRO (0.2); electronically file with the court consent motion to extend time to respond to motion to clarify TRO (0.3); prepare for filing certificate of service regarding motion to extend time (0.2); electronically file with the court motion to extend time (0.3)	1.00	540.00	540.00
08/15/2023	LAD4	Analyze/comment on partial default concept	1.40	1,860.00	2,604.00
08/15/2023	AEL2	Edit draft motion to compel discovery	0.90	1,625.00	1,462.50
08/15/2023	AEL2	Call with W. Farmer re: HCHK discovery	0.40	1,625.00	650.00
08/15/2023	AEL2	Review and comment on intervenor claims for D. Barron	0.50	1,625.00	812.50
08/15/2023	AEL2	Call to J. Temkin re: DiBattista testimony	0.10	1,625.00	162.50
08/15/2023	AEL2	Draft argument re: intervention discovery for hearing	1.90	1,625.00	3,087.50
08/15/2023	NAB	Review outline for status conference (.2); correspond with A. Luft regarding same (.2); correspond with W. Farmer regarding draft motion to compel (.2); correspond with A. Luft regarding outcome of hearing (.2)	0.80	1,625.00	1,300.00

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08/15/2023	WCF	Call with A. Luft regarding HCHK motion to compel productions (.4); review and revise motion to compel HCHK discovery productions (.9)	1.30	1,235.00	1,605.50
08/16/2023	DEB4	Correspond with P. Parizek (Kroll) regarding HCHK intervenors (0.2); correspond with W. Farmer regarding motion for stay pending appeal (0.1); correspond with D. Skalka (NPM) regarding same (0.1); correspond with L. Despins regarding rule 9019 order issues (0.5); correspond with M. Tsukerman (CS) regarding case issues/tasks (0.1)	1.00	1,320.00	1,320.00
08/16/2023	LAD4	T/c R. Jareck (Cole Schotz) re: partial settlement (.30); review/comment on same (1.80)	2.10	1,860.00	3,906.00
08/16/2023	AEL2	Analyze Kroll findings re: intervenors	0.80	1,625.00	1,300.00
08/16/2023	AEL2	Analyze data on proposed intervenors' contributions	0.40	1,625.00	650.00
08/16/2023	AEL2	Correspond with D. Skalka and D. Barron re: HCHK leave to appeal motion	0.20	1,625.00	325.00
08/16/2023	AEL2	Correspond with A. Pfeiffer (Kroll) re: investigation findings	0.30	1,625.00	487.50
08/17/2023	AEL2	Correspond with L. Despins re: A. DiBattista counsel call	0.10	1,625.00	162.50
08/18/2023	DEB4	Correspond with S. Maza regarding alter ego issues	0.50	1,320.00	660.00
08/18/2023	AEL2	Correspond with N. Bassett re: HCHK discovery plan	0.30	1,625.00	487.50
08/18/2023	AEL2	Meet and confer with counsel for proposed HCHK intervenors and W. Farmer re: scope of discovery request	0.70	1,625.00	1,137.50
08/18/2023	AEL2	Prepare outline for meet and confer with counsel for proposed HCHK intervenors on document request scope and depositions	0.30	1,625.00	487.50
08/18/2023	AEL2	Call with W. Farmer re: meet and confer follow up	0.30	1,625.00	487.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2023	WCF	Attend call with counsel to HCHK intervenors and A. Luft regarding outstanding discovery (.7); follow-up call with A. Luft regarding same (.3)	1.00	1,235.00	1,235.00
08/21/2023	JPK1	Draft responses and objections to first set of requests for production of documents from HCHK intervenors	1.50	915.00	1,372.50
08/21/2023	AEL2	Correspond with N. Bassett re: call with A. DiBattista counsel	0.20	1,625.00	325.00
08/21/2023	AEL2	Call with J. Tempkin re: A. DiBattista	0.40	1,625.00	650.00
08/21/2023	NAB	Call with R. Jareck (Cole Schotz) regarding stipulation on motion to stay and state court litigation (.2); correspond with A. Luft regarding same (.2)	0.40	1,625.00	650.00
08/22/2023	JPK1	Continue drafting responses and objections to proposed intervenors' discovery (3.5); correspond with N. Bassett regarding the same (.3)	3.80	915.00	3,477.00
08/22/2023	NAB	Review and revise discovery responses (.7); correspond with J. Kosciwicz regarding same (.2); correspond with opposing counsel regarding stipulation as to motion to stay (.1)	1.00	1,625.00	1,625.00
08/23/2023	DEB4	Correspond with W. Farmer regarding HCHK discovery	0.10	1,320.00	132.00
08/23/2023	DEB4	Correspond with N. Bassett and regarding Japan Himalaya appeal withdrawal	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with E. Sutton regarding HCKH premises follow up	0.10	1,320.00	132.00
08/23/2023	DEB4	Correspond with P. Friedman (OMM) regarding Holy City Hong Kong	0.10	1,320.00	132.00
08/23/2023	ECS1	Correspond with Cole Schotz re HCHK moving/liquidation of HCHK property at 3 Columbus Circle	0.20	1,015.00	203.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/23/2023	JPK1	Incorporate N. Bassett's comments on responses and objections to proposed intervenors' discovery to the Trustee (.6); further review and revise the same (.4); correspond with N. Bassett regarding the same (.2)	1.20	915.00	1,098.00
08/23/2023	AEL2	Review information regarding potential intervenors' transfers	0.90	1,625.00	1,462.50
08/23/2023	NAB	Correspond with J. Kosciwicz regarding discovery issues (.2); review update on same (.2)	0.40	1,625.00	650.00
08/24/2023	DEB4	Correspond with R. Jareck (CS) regarding HCHK bank accounts (0.1); correspond with A. Lomas (Kroll) regarding same (0.1); correspond with E. Sutton regarding HCHK office move (0.1); conference with N. Bassett, J. Kosciwicz, W. Farmer, E. Sutton, and regarding pending and upcoming discovery and plan for same (1.2); correspond with S. Maza regarding standing issues (0.3); conference with regarding HCHK depositions (0.1); correspond with A. Lomas (Kroll) regarding Xuebing Wang (0.1); correspond with E. Sutton regarding HCHK documents (0.1)	2.10	1,320.00	2,772.00
08/24/2023	ECS1	Correspond with Cole Schotz regarding HCHK matters, HCHK moving/liquidation of HCHK property at 3 Columbus Circle, and payment of HCHK payroll	0.50	1,015.00	507.50
08/24/2023	ECS1	Document review of proposed intervenors' production (1.2); prepare summary re same (.5)	1.70	1,015.00	1,725.50
08/24/2023	ECS1	Prepare outlines for deposition of proposed intervenors in HCHK adversary proceeding (3.0); correspond with J. Kosciwicz re same (.1); call with N. Bassett, D. Barron, W. Farmer, J. Kosciwicz and regarding HCHK discovery, depositions, and trial preparations (1.2)	4.30	1,015.00	4,364.50

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08/24/2023	ECS1	Prepare and serve subpoena on proposed intervenor in HCHK adversary proceeding (.4); correspond with A. Luft regarding same (.1)	0.50	1,015.00	507.50
08/24/2023	JK21	Review and handle service of subpoena and notice of deposition to Shin Hsin Yu	0.40	540.00	216.00
08/24/2023	JPK1	Attend teleconference with N. Bassett, D. Barron, E. Sutton, W. Farmer, and regarding HCHK litigation and discovery issues/task list	1.20	915.00	1,098.00
08/24/2023	AEL2	Consider plan/strategy for HCHK depositions (.4); prepare questions for same (1.7)	2.10	1,625.00	3,412.50
08/24/2023	AEL2	Prepare for team meeting by reviewing issues and tasks related to upcoming HCHK depositions	0.80	1,625.00	1,300.00
08/24/2023	AEL2	Correspond with T. Rutherford re: intervenor depositions	0.40	1,625.00	650.00
08/24/2023		Conference with N. Bassett, D. Barron, W. Farmer, J. Kosciwicz, and E. Sutton on HCHK discovery, depositions, and trial preparations (1.2); prepare follow up notes regarding same (.1)	1.30	815.00	1,059.50
08/24/2023		Correspond with D. Barron on HCHK depositions (.1); call with D. Barron regarding same (.1)	0.20	815.00	163.00
08/24/2023	NAB	Review documents produced in discovery and related items in connection with intervention motion (.5); call with W. Farmer, D. Barron, J. Kosciwicz, E. Sutton, and regarding same (1.2)	1.70	1,625.00	2,762.50
08/24/2023	WCF	Call with N. Bassett, D. Barron, J. Kosciwicz, E. Sutton, regarding HCHK pending and upcoming discovery and depositions	1.20	1,235.00	1,482.00

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08/25/2023	DEB4	Conference with R. Jareck (CS) regarding HCHK accounts (0.3); correspond with L. Despins regarding default motion (0.1); correspond with R. Jareck (CS) regarding same (0.2); correspond with A. Luft regarding litigation issues (0.4); correspond with L. Despins regarding Taurus/HCHK connection (0.1); correspond with A. Lomas (Kroll) regarding same (0.1); correspond with L. Despins and A. Luft regarding email from Holy City counsel (0.1)	1.30	1,320.00	1,716.00
08/25/2023	ECS1	Correspond with N. Bassett and D. Barron about appeal of rule 9019 order in HCHK adversary proceeding	0.20	1,015.00	203.00
08/25/2023	JPK1	Review HCHK proposed intervenor fact sheets provided by	0.30	915.00	274.50
08/25/2023	NAB	Correspond with L. Despins regarding HCHK adversary proceeding issues	0.30	1,625.00	487.50
08/26/2023		Review certificate of service of the summons and complaint and answer deadline for the defendants	0.30	815.00	244.50
08/26/2023	NAB	Draft email with opposing counsel regarding default for failure to answer (.2); review authority related to same (.3); correspond with L. Despins regarding same (.1); review Kroll emails regarding HCHK fund tracing issues (.4)	1.00	1,625.00	1,625.00
08/27/2023	DEB4	Correspond with L. Despins and regarding informant information (0.1); correspond with E. Sutton regarding premises issues (0.1)	0.20	1,320.00	264.00
08/27/2023	ECS1	Correspond with L. Despins and D. Barron regarding HCHK entities and moving property from their leased space	0.20	1,015.00	203.00
08/27/2023	NAB	Correspond with opposing counsel regarding answer deadline	0.10	1,625.00	162.50

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08/28/2023	DEB4	Conference with L. Despins, J. Kosciwicz, E. Sutton, , N. Bassett, and A. Luft regarding intervenor document production (0.9); conference with regarding issues/task list related to HCHK depositions and documents (0.5); correspond with L. Despins regarding Japan Himalaya appeal withdrawal (0.2)	1.60	1,320.00	2,112.00
08/28/2023	DEB4	Correspond with R. Jareck regarding bank documents	0.10	1,320.00	132.00
08/28/2023	DEB4	Correspond with E. Sutton regarding HCHK loan documents	0.20	1,320.00	264.00
08/28/2023	DEB4	Correspond with N. Bassett, A. Luft and L. Despins regarding motion to extend answer deadline	0.20	1,320.00	264.00
08/28/2023	ECS1	Review proposed intervenors production documents (2.7); prepare summary regarding same (.5); call with L. Despins, N. Bassett, A. Luft, D. Barron, , and J. Kosciwicz regarding same (.9); further analyze proposed intervenors document production (1.3); prepare chart analyzing proposed intervenors production (1.5); correspond with N. Bassett and A. Luft regarding same (.3)	7.20	1,015.00	7,308.00
08/28/2023	JPK1	Correspond with N. Bassett regarding HCHK discovery responses and objections	0.10	915.00	91.50
08/28/2023	JPK1	Attend teleconference with L. Despins, N. Bassett, D. Barron, A. Luft, , and E. Sutton regarding HCHK proposed intervenors and their document production	0.90	915.00	823.50
08/28/2023	LAD4	T/c S. Sarnoff (OMM) re: update on HCHK (.40); t/c A. Luft re: same (.20); t/c A. Luft, E. Sutton, , D. Barron, N. Bassett, J. Kosciwicz re: HCHK documents and strategy (.90); review documents (.70); analyze/comment on strategy re: default (1.50)	3.70	1,860.00	6,882.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/2023	AEL2	Review documents re: HCHK intervenors' transfers (2.3); analyze issues from same (.4)	2.70	1,625.00	4,387.50
08/28/2023	AEL2	Call with L. Despins regarding HCHK update (.2); meeting with D. Barron, L. Despins, N. Bassett, E. Sutton, J. Kosciwicz, re: HCHK documents (.90)	1.10	1,625.00	1,787.50
08/28/2023		Conference with L. Despins, N. Bassett, A. Luft, D. Barron, E. Sutton and J. Kosciwicz on HCHK intervenors production	0.90	815.00	733.50
08/28/2023		Review HCHK intervenors production on Relativity	0.20	815.00	163.00
08/28/2023		Phone call with on her role at Kwok's organization and HCHK	1.60	815.00	1,304.00
08/28/2023		Conference with D. Barron on HCHK depositions and documents	0.50	815.00	407.50
08/28/2023		Review documents shared by informant	1.20	815.00	978.00
08/28/2023		Prepare memo on phone call with regarding her role at HCHK	0.90	815.00	733.50
08/28/2023	NAB	Call with L. Despins, A. Luft, D. Barron, E. Sutton, , and J. Kosciwicz regarding HCHK document analysis, litigation strategy, and deposition preparations (.9); analyze documents produced in discovery (1.7); correspond with E. Sutton regarding same (.3); review draft responses and objections to document requests (.5); review discovery documents and certain submissions in preparation for depositions (1.4)	4.80	1,625.00	7,800.00
08/29/2023	DEB4	Correspond with L. Despins regarding HCHK documents from Cole Schotz (0.2); correspond with P. Linsey (NPM) regarding motion to extend time (0.10); correspond with regarding Holy City documents (0.1); conferences with A. Luft regarding discovery issues (0.3)	0.70	1,320.00	924.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	ECS1	Prepare outlines for depositions of proposed intervenors in HCHK adversary proceeding (1.9); correspond with D. Barron regarding same (.1); correspond with D. Barron and regarding same (.1)	2.20	1,015.00	2,233.00
08/29/2023	ECS1	Review correspondence with counsel to proposed intervenors in HCHK adversary proceeding regarding their discovery obligations (.1); correspond with N. Bassett and W. Farmer regarding same (.1)	0.20	1,015.00	203.00
08/29/2023	ECS1	Prepare documents and exhibits for depositions of proposed intervenors in HCHK adversary proceeding	0.50	1,015.00	507.50
08/29/2023	ECS1	Review proposed Intervenor's production (.2); correspond with N. Bassett regarding same (.2)	0.40	1,015.00	406.00
08/29/2023	JPK1	Review and revise Trustee's responses and objections to proposed intervenors' discovery (.4); review and comment on service of same on opposing counsel (.2)	0.60	915.00	549.00
08/29/2023	JPK1	Correspond with S. Phan (UnitedLex) regarding HCHK document production	0.20	915.00	183.00
08/29/2023	JPK1	Review Pastore LLC letter to Trustee dated August 29, 2023	0.10	915.00	91.50
08/29/2023	AEL2	Calls with D. Barron re: upcoming discovery (.3); review intervenor issues related to same (.2)	0.50	1,625.00	812.50
08/29/2023	AEL2	Correspond with N. Bassett re: HCHK intervenor evidence	0.40	1,625.00	650.00
08/29/2023		Correspond with D. Barron regarding HCHK intervenors document production	0.20	815.00	163.00
08/29/2023		Review documents produced by HCHK intervenors	1.40	815.00	1,141.00
08/29/2023		Correspond with E. Sutton on HCHK deposition preparation	0.20	815.00	163.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	NAB	Further review HCHK discovery documents and summary of same from E. Sutton (.4); correspond with E. Sutton regarding same (.1); call with A. Luft regarding HCHK discovery issues and deposition preparations (.4); correspond with W. Farmer regarding intervenor document productions (.2); review correspondence from intervenor counsel regarding same (.1)	1.20	1,625.00	1,950.00
08/29/2023	WCF	Call with T. Rutherford regarding responses and objections to discovery	0.20	1,235.00	247.00
08/30/2023	DM26	Prepare documents for HCHK depositions (.4); email E. Sutton regarding same (.2)	0.60	540.00	324.00
08/30/2023	DEB4	Correspond with J. Kosciwicz regarding depositions (0.1); correspond with A. Luft regarding same (0.1); correspond with N. Bassett regarding same (0.1); correspond with L. Despins regarding alleged HCHK creditor representatives (0.1)	0.40	1,320.00	528.00
08/30/2023	ECS1	Prepare documents and exhibits for depositions of proposed intervenors in HCHK adversary proceeding	0.40	1,015.00	406.00
08/30/2023	ECS1	Prepare deposition outlines for depositions of proposed intervenors in HCHK adversary proceeding (4.1); correspond with D. Barron regarding same (.1); correspond with regarding same (.1); correspond with D. Barron and regarding same (.3)	4.60	1,015.00	4,669.00
08/30/2023	ECS1	Analyze case law regarding standard for recharacterization of loans in Second Circuit	1.20	1,015.00	1,218.00
08/30/2023	ECS1	Review proposed intervenors' production in HCHK adversary proceeding (.5); call with J. Kosciwicz regarding same (.2)	0.70	1,015.00	710.50
08/30/2023	JK21	Research recharacterization of loan	0.90	540.00	486.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/30/2023	JPK1	Correspond with E. Sutton regarding HCHK document production (.1); call with E. Sutton regarding same (.2)	0.30	915.00	274.50
08/30/2023	JPK1	Review HCHK documents received from assignee for responsiveness to proposed intervenors' requests for production (1.5); correspond with S. Phan (UnitedLex) regarding document production (.3)	1.80	915.00	1,647.00
08/30/2023	AEI2	Analyze discovery time frame cut off for requests	0.40	1,625.00	650.00
08/30/2023		Review documents provided by informant	4.80	815.00	3,912.00
08/30/2023		Correspond with informant on HCHK related documents	0.20	815.00	163.00
08/30/2023	NAB	Correspond with A. Luft regarding HCHK intervenor discovery issues (.2); prepare strategy and topics for depositions (.7); correspond with J. Kosciwicz regarding HCHK document production (.2)	1.10	1,625.00	1,787.50
08/31/2023	DEB4	Correspond with J. Kosciwicz regarding G Club issues (0.1); correspond with P. Linsey (NPM) regarding assignment documents (0.2)	0.30	1,320.00	396.00
08/31/2023	DEB4	Correspond with P. Linsey (NPM) regarding motion to extend time to file answer	0.10	1,320.00	132.00
08/31/2023	ECS1	Continue to prepare deposition outlines for depositions of proposed intervenors in HCHK adversary proceeding (3.7); correspond with regarding same (.1); correspond with D. Barron regarding same (.1)	3.90	1,015.00	3,958.50
08/31/2023	ECS1	Review discovery documents and certain submissions in preparing for depositions of proposed intervenors in HCHK adversary proceeding	0.70	1,015.00	710.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	JPK1	Correspond with A. Luft about G Club (.2); correspond with D. Barron regarding the same (.1)	0.30	915.00	274.50
08/31/2023	JPK1	Review motion for intervention (.7); review proposed intervenors' documents (1.2); draft parts of deposition outline for 1332156 B.C. (1.8)	3.70	915.00	3,385.50
08/31/2023	AEL2	Correspond with N. Bassett re: deposition strategy	0.40	1,625.00	650.00
08/31/2023		Review GWGOPNZ production on Relativity	0.20	815.00	163.00
08/31/2023		Review Kwok livestream on farm loan program and HCHK loan agreements	1.80	815.00	1,467.00
08/31/2023		Review documents provided by informant on HCHK entities	0.20	815.00	163.00
08/31/2023	NAB	Correspond with P. Linsey (NPM) regarding response to motion to extend time to answer (.2); analyze legal issues and topics for upcoming depositions and related discovery (.5)	0.70	1,625.00	1,137.50
Subtotal: B191 General Litigation			222.80		271,844.50
B195 Non-Working Travel					
08/15/2023	LAD4	Travel to/from Bridgeport for hearing (Bill at 1/2 rate)	0.90	930.00	837.00
08/15/2023	AEL2	Travel to NY from Court in Bridgeport after hearing (Bill at 1/2 rate)	2.20	812.50	1,787.50
Subtotal: B195 Non-Working Travel			3.10		2,624.50
Total			236.20		292,092.50

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	14.30	1,860.00	26,598.00
LAD4	Luc A. Despins	Partner	0.90	930.00	837.00
NAB	Nicholas A. Bassett	Partner	21.90	1,625.00	35,587.50
AEL2	Luft, Avi E.	Of Counsel	42.60	1,625.00	69,225.00
AEL2	Luft, Avi E.	Of Counsel	2.20	812.50	1,787.50
DEB4	Douglass E. Barron	Associate	34.20	1,320.00	45,144.00
WCF	Will C. Farmer	Associate	13.10	1,235.00	16,178.50
ECS1	Ezra C. Sutton	Associate	31.20	1,015.00	31,668.00
JPK1	Jon P. Kosciwicz	Associate	45.00	915.00	41,175.00
		Associate	26.40	815.00	21,516.00
JK21	Jocelyn Kuo	Paralegal	3.80	540.00	2,052.00
DM26	David Mohamed	Paralegal	0.60	540.00	324.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/10/2023	Photocopy Charges (Color)	360.00	0.20	72.00
08/10/2023	Lexis/On Line Search			31.99
08/14/2023	Computer Search (Other)			11.52
08/17/2023	Computer Search (Other)			1.26
08/23/2023	Computer Search (Other)			2.43
08/24/2023	Computer Search (Other)			0.09
08/25/2023	Vendor Expense - Mitsui Sumitomo Card, Invoice# 3616087-2 Dated 08/25/23, Copy of company registration for Japan Himalaya League KK, requested by from NY Office			2.32
08/27/2023	Lexis/On Line Search			33.33
08/30/2023	Lexis/On Line Search			223.90
08/30/2023	Lexis/On Line Search			66.67
08/30/2023	Westlaw			24.77

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00014
Invoice No. 2371618

Page 25

Total Costs incurred and advanced	\$470.28
Current Fees and Costs	\$292,562.78
Total Balance Due - Due Upon Receipt	\$292,562.78



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371619

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Interpleader Adversary Proceeding

PH LLP Client/Matter # 50687-00015
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$792.00

Current Fees and Costs Due

\$792.00

Total Balance Due - Due Upon Receipt

\$792.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:

Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA 90189-4803

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Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371619

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Interpleader Adversary Proceeding

PH LLP Client/Matter # 50687-00015

Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$792.00

Current Fees and Costs Due

\$792.00

Total Balance Due - Due Upon Receipt

\$792.00

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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371619

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Interpleader Adversary Proceeding **\$792.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	NAB	Correspond with P. Linsey (NPM) regarding pretrial conference (.1); review proposed filing regarding same (.1); further correspond with P. Linsey regarding same (.3)	0.30	1,625.00	487.50
08/10/2023	ECS1	Prepare email to A. Luft regarding HK USA's interpleader and summary judgment briefs	0.30	1,015.00	304.50
Subtotal: B191 General Litigation			0.60		792.00
Total			0.60		792.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	0.30	1,625.00	487.50
ECS1	Ezra C. Sutton	Associate	0.30	1,015.00	304.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00015
Invoice No. 2371619

Page 2

Current Fees and Costs	\$792.00
Total Balance Due - Due Upon Receipt	<u><u>\$792.00</u></u>



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371620

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Mei Guo Adversary Proceeding

PH LLP Client/Matter # 50687-00016
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$53,653.50

Current Fees and Costs Due

\$53,653.50

Total Balance Due - Due Upon Receipt

\$53,653.50

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371620

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Mei Guo Adversary Proceeding

PH LLP Client/Matter # 50687-00016
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$53,653.50

Current Fees and Costs Due

\$53,653.50

Total Balance Due - Due Upon Receipt

\$53,653.50

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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371620

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Mei Guo Adversary Proceeding

\$53,653.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	DEB4	Correspond with A. Luft regarding Mei Guo discovery issues	0.30	1,320.00	396.00
08/03/2023	AEL2	Review subpoenas sent by defendants	0.40	1,625.00	650.00
08/04/2023	AEL2	Correspond with K. Kearny re: subpoena they received from defendants	0.10	1,625.00	162.50
08/07/2023	AEL2	Call with M. Keeley re: subpoena Williams & Connolly received	0.40	1,625.00	650.00
08/07/2023	AEL2	Correspond with N. Bassett re: privilege issues and testimony	0.30	1,625.00	487.50
08/07/2023	AEL2	Analyze defendant subpoena privilege and responsiveness issues	1.10	1,625.00	1,787.50
08/07/2023	AEL2	Analyze impact of Y. Wang representation on M. Guo representation	0.50	1,625.00	812.50
08/09/2023	AEL2	Analyze issues and prepare notes for meet and confer with Mei Guo counsel (.2); meet and confer with Mei Guo counsel and N. Bassett, P. Linsey re: remaining claims and preliminary injunction (.8)	1.00	1,625.00	1,625.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00016
Invoice No. 2371620

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/09/2023	AEI2	Call with N. Bassett re: preliminary injunction and mandamus issues	0.40	1,625.00	650.00
08/09/2023	NAB	Call with J. Moriarty (Zeisler), L. Vartan (CSG), A. Romney (Zeisler), A. Luft, and P. Linsey (NPM) regarding injunction issues, mandamus issues, and pretrial conference (.8); follow-up call with A. Luft regarding same (.4); follow-up call with P. Linsey regarding same (.2); correspond with L. Despins regarding same (.1)	1.50	1,625.00	2,437.50
08/14/2023	AEI2	Draft argument for hearing re: interpleader and summary judgment claims	3.40	1,625.00	5,525.00
08/15/2023	AEI2	Call to K. Kearney re: subpoena they received	0.10	1,625.00	162.50
08/18/2023		Review Mei Guo production on tax returns	0.30	815.00	244.50
08/22/2023	JK21	Review and manage service to Judge Dooley regarding appellee's memorandum of law and appendix	0.60	540.00	324.00
08/23/2023	DEB4	Correspond with N. Bassett and A. Luft regarding summary judgment motion	0.10	1,320.00	132.00
08/23/2023	DEB4	Correspond with W. Farmer regarding Williams and Connolly document review	0.10	1,320.00	132.00
08/24/2023	DEB4	Correspond with W. Farmer regarding review of Williams and Connolly documents (0.1); conference with J. Kosciwicz regarding interrogatory responses (0.8)	0.90	1,320.00	1,188.00
08/24/2023	JK21	Correspond with J. Kosciwicz regarding Mei Guo sealed complaint	0.20	540.00	108.00
08/24/2023	JPK1	Draft responses to M. Guo's interrogatories	1.70	915.00	1,555.50
08/24/2023	JPK1	Correspond with D. Barron regarding responses to Mei Guo's discovery to the Trustee (.5); conference with D. Barron regarding same (.8)	1.30	915.00	1,189.50
08/25/2023	JPK1	Continue drafting responses and objections to Mei Guo's first set of interrogatories to the Trustee	2.20	915.00	2,013.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00016
Invoice No. 2371620

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/27/2023	JPK1	Further draft responses to Mei Guo's first set of interrogatories to the Trustee	2.90	915.00	2,653.50
08/28/2023	DEB4	Correspond with N. Bassett regarding Mei Guo's interrogatories to the Trustee	0.10	1,320.00	132.00
08/28/2023	JPK1	Review and revise responses and objections to Mei Guo's first set of interrogatories to the Trustee (.8); correspond with N. Bassett regarding the same (.1)	0.90	915.00	823.50
08/28/2023	JPK1	Draft responses and objections to Mei Guo's first set of requests for production to the Trustee	5.80	915.00	5,307.00
08/28/2023	NAB	Review and revise draft interrogatory responses (.6); correspond with J. Kosciwicz regarding same (.1)	0.70	1,625.00	1,137.50
08/29/2023	DEB4	Analyze draft interrogatories (0.8); conference with N. Bassett regarding complaint (0.2)	1.00	1,320.00	1,320.00
08/29/2023	JPK1	Draft responses and objections to Mei Guo's requests for production of documents to the Trustee (1.3); review and revise the same (1.4); correspond with N. Bassett regarding the same (.1)	2.80	915.00	2,562.00
08/29/2023	JPK1	Correspond with D. Barron regarding Mei Guo discovery	0.20	915.00	183.00
08/29/2023	JPK1	Prepare responses and objections to Mei Guo's interrogatories	2.50	915.00	2,287.50
08/29/2023	AEL2	Analyze discovery issues to prepare for meet and confer with A. Romney (.4); meet and confer with A. Romney and N. Bassett re: discovery objections and third party subpoenas (.6)	1.00	1,625.00	1,625.00
08/29/2023	NAB	Further review draft interrogatory responses (.4); call with D. Barron regarding complaint issues (.2); correspond with A. Luft regarding same (.1); call with A. Luft, A. Romney (Zeisler) regarding discovery issues (.6)	1.30	1,625.00	2,112.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00016
Invoice No. 2371620

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/30/2023	DEB4	Conference with J. Kosciwicz regarding responses and objections to Mei Guo's interrogatories	1.10	1,320.00	1,452.00
08/30/2023	JPK1	Incorporate A. Luft's comments into responses and objections to Mei Guo's requests for production (1.8); incorporate A. Luft's comments into responses and objections to Mei Guo's interrogatories (1.6); correspond with opposing counsel regarding the same (.2)	3.60	915.00	3,294.00
08/30/2023	JPK1	Telephone conference with D. Barron regarding responses and objections to Mei Guo discovery	1.10	915.00	1,006.50
08/30/2023	AEL2	Review and revise RFP responses	1.30	1,625.00	2,112.50
08/30/2023	AEL2	Review and revise interrogatory responses	2.10	1,625.00	3,412.50
Subtotal: B191 General Litigation			45.30		53,653.50
Total			45.30		53,653.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	3.50	1,625.00	5,687.50
AEL2	Luft, Avi E.	Of Counsel	12.10	1,625.00	19,662.50
DEB4	Douglass E. Barron	Associate	3.60	1,320.00	4,752.00
JPK1	Jon P. Kosciwicz	Associate	25.00	915.00	22,875.00
		Associate	0.30	815.00	244.50
JK21	Jocelyn Kuo	Paralegal	0.80	540.00	432.00

Current Fees and Costs	\$53,653.50
Total Balance Due - Due Upon Receipt	\$53,653.50



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371621

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

HK USA Adversary Proceeding

PH LLP Client/Matter # 50687-00017
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$95,988.75
Costs incurred and advanced	488.48
Current Fees and Costs Due	\$96,477.23
Total Balance Due - Due Upon Receipt	\$96,477.23

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Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371621

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

HK USA Adversary Proceeding

PH LLP Client/Matter # 50687-00017
Luc A. Despins

Legal fees for professional services for the period ending August 31, 2023	\$95,988.75
Costs incurred and advanced	488.48
Current Fees and Costs Due	\$96,477.23
Total Balance Due - Due Upon Receipt	\$96,477.23

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September 18, 2023

Please Refer to
 Invoice Number: 2371621

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

HK USA Adversary Proceeding **\$95,988.75**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 Court Hearings					
08/15/2023	AEL2	Participate in hearing re: HK USA and summary judgment claims	2.50	1,625.00	4,062.50
Subtotal: B155 Court Hearings			2.50		4,062.50
B191 General Litigation					
08/01/2023	DEB4	Analyze response to claims re HK USA summary judgment (.2); conference with A. Luft regarding HK USA summary judgment (.3)	0.50	1,320.00	660.00
08/01/2023	AEL2	Meet with D. Barron re: response on claims 3-5 in complaint	0.30	1,625.00	487.50
08/01/2023	NAB	Correspond with P. Linsey (NPM) regarding appellate issues (.2); correspond with A. Luft regarding preliminary injunction filing (.1)	0.30	1,625.00	487.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00017
Invoice No. 2371621

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2023	NAB	Correspond with L. Despins regarding preliminary injunction issues (.1); correspond with J. Moriarty (Zeisler) regarding same (.1)	0.20	1,625.00	325.00
08/06/2023	NAB	Review appellate brief (1.0); correspond with W. Farmer regarding same (.1); analyze authority for response brief (.4)	1.50	1,625.00	2,437.50
08/07/2023	DEB4	Correspond with N. Bassett regarding appellate brief	0.50	1,320.00	660.00
08/07/2023	KC27	Call with W. Farmer regarding argument appeal chart (.2); review appellant's appeal brief (.8)	1.00	915.00	915.00
08/07/2023	LAD4	Review appellant's brief (1.10); outline responsive points (.80)	1.90	1,860.00	3,534.00
08/07/2023	AEL2	Review evidence regarding Guo's use of yacht for appeal	0.70	1,625.00	1,137.50
08/07/2023	NAB	Analyze appellate issues (1.1); further review opening appellate brief (.4); correspond with D. Barron regarding same (.1); correspond with S. Sarnoff (OMM) and E. Grossman (OMM) regarding same (.2)	1.80	1,625.00	2,925.00
08/07/2023	WCF	Call with K. Catalano regarding HK USA appeal (.2); analyze appellants' summary judgment appeal brief in connection with preparing Trustee's response brief (1.9)	2.10	1,235.00	2,593.50
08/08/2023	KC27	Prepare argument appeal chart	1.80	915.00	1,647.00
08/08/2023	NAB	Analyze summary judgment order appeal strategy (.4); call with S. Sarnoff (OMM), E. Grossman (OMM), and W. Farmer regarding same (.6)	1.00	1,625.00	1,625.00
08/08/2023	WCF	Call with S. Sarnoff and E. Grossman (OMM) and N. Bassett regarding summary judgement order appeal strategy	0.60	1,235.00	741.00
08/14/2023	DEB4	Correspond with A. Luft regarding HK USA hearing	0.10	1,320.00	132.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00017
Invoice No. 2371621

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2023	WCF	Draft talking points regarding HK USA status conference (.2); review case docket, correspondence, and pleadings regarding same (.2)	0.40	1,235.00	494.00
08/15/2023	AEL2	Review submissions and prepare notes for hearing on interpleader and summary judgment claims (1.0); call with N. Bassett regarding same (.1)	1.10	1,625.00	1,787.50
08/15/2023	AEL2	Correspond with N. Bassett re: summary of hearing	0.40	1,625.00	650.00
08/15/2023	NAB	Review outline for status conference (.1); call with A. Luft regarding same (.1)	0.20	1,625.00	325.00
08/17/2023	KC27	Prepare argument chart for appellate brief (2.2); correspond with W. Farmer regarding same (.1)	2.30	915.00	2,104.50
08/22/2023	ECS1	Review and comment on service of appeal brief and appendix on district court	0.20	1,015.00	203.00
08/22/2023	NAB	Call with W. Farmer regarding appellate brief in HK USA summary judgment orders appeals (.3); prepare outline for same (.2)	0.50	1,625.00	812.50
08/22/2023	WCF	Analyze authorities regarding appellee brief for HK USA summary judgment appeals (2.4); call with N. Bassett regarding same (.3); draft consolidated appellee brief regarding collateral estoppel summary judgment order (3.6); draft consolidated appellee brief regarding alter ego summary judgment order (2.6)	8.90	1,235.00	10,991.50
08/23/2023	NAB	Review and revise HK USA appellate brief (.9); draft parts of same (1.3); analyze case law relating to same (.9)	3.10	1,625.00	5,037.50
08/23/2023	WCF	Analyze pleadings and docket items regarding appellee brief for HK USA summary judgment appeals	1.10	1,235.00	1,358.50
08/24/2023	NAB	Review and revise draft appellate brief (.9); correspond with W. Farmer regarding same (.1)	1.00	1,625.00	1,625.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00017
Invoice No. 2371621

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	WCF	Call with P. Linsey (NPM) regarding drafting HK USA summary judgment appeal brief	0.40	1,235.00	494.00
08/27/2023	WCF	Analyze authorities regarding alter ego and Delaware law (1.3); continue drafting appellee brief regarding first and second orders granting partial summary judgment (1.6)	2.90	1,235.00	3,581.50
08/28/2023	NAB	Call with P. Linsey (NPM) regarding HK USA appellate brief (.3); prepare parts of same (.5)	0.80	1,625.00	1,300.00
08/28/2023	WCF	Draft consolidated appellate brief regarding statement of case and partial summary judgment order on alter ego claim (4.2); analyze authorities regarding fraud analysis in alter ego context (1.2); draft appellate brief regarding summary of argument, introduction and collateral estoppel (3.3)	8.70	1,235.00	10,744.50
08/29/2023	NAB	Review and revise draft HK USA appellate brief (2.5); analyze caselaw relating to same (1.1); correspond with W. Farmer regarding same (.7); further revise draft appellate brief (1.2)	5.50	1,625.00	8,937.50
08/29/2023	WCF	Draft parts of HK USA summary judgment appellate brief (2.1); analyze authorities regarding same (.6)	2.70	1,235.00	3,334.50
08/30/2023	NAB	Review and revise draft appellate brief (1.8); analyze authority regarding same (.9); review record evidence and pleadings regarding same (.7); correspond with W. Farmer regarding same and appellate issues (.6); call with W. Farmer regarding same (.3)	4.30	1,625.00	6,987.50
08/30/2023	WCF	Analyze authorities regarding right to appeal and collateral estoppel (1.1); call with N. Bassett regarding same (.3); draft parts of HK USA appellate brief (2.5)	3.90	1,235.00	4,816.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00017
Invoice No. 2371621

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2023	KC27	Review draft appellee brief (.8); correspond with W. Farmer regarding same (.1); correspond with N. Bassett regarding same (.1)	1.00	915.00	915.00
08/31/2023	NAB	Prepare parts of appellate brief (1.8); correspond with K. Catalano regarding same (.2)	2.00	1,625.00	3,250.00
Subtotal: B191 General Litigation			65.70		90,057.50
B195 Non-Working Travel					
08/15/2023	AEL2	Travel from NY to hearing in Bridgeport, CT (Bill at 1/2 rate)	2.30	812.50	1,868.75
Subtotal: B195 Non-Working Travel			2.30		1,868.75
Total			70.50		95,988.75

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	1.90	1,860.00	3,534.00
NAB	Nicholas A. Bassett	Partner	22.20	1,625.00	36,075.00
AEL2	Luft, Avi E.	Of Counsel	5.00	1,625.00	8,125.00
AEL2	Luft, Avi E.	Of Counsel	2.30	812.50	1,868.75
DEB4	Douglass E. Barron	Associate	1.10	1,320.00	1,452.00
WCF	Will C. Farmer	Associate	31.70	1,235.00	39,149.50
ECS1	Ezra C. Sutton	Associate	0.20	1,015.00	203.00
KC27	Kristin Catalano	Associate	6.10	915.00	5,581.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00017
Invoice No. 2371621

Page 6

Costs incurred and advanced				
<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023	Lexis/On Line Search			33.33
08/22/2023	Westlaw			155.15
08/28/2023	Lexis/On Line Search			300.00
Total Costs incurred and advanced				<u>\$488.48</u>
Current Fees and Costs				\$96,477.23
Total Balance Due - Due Upon Receipt				<u><u>\$96,477.23</u></u>



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371622

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Bravo Luck Adversary Proceeding

PH LLP Client/Matter # 50687-00018
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$6,652.00

Current Fees and Costs Due

\$6,652.00

Total Balance Due - Due Upon Receipt

\$6,652.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371622

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Bravo Luck Adversary Proceeding

PH LLP Client/Matter # 50687-00018
Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$6,652.00

Current Fees and Costs Due

\$6,652.00

Total Balance Due - Due Upon Receipt

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Luc Despins as Chapter 11 Trustee in the case of Ho
 Wan Kwok
 200 Park Avenue
 New York, NY 10166

September 18, 2023

Please Refer to
 Invoice Number: 2371622

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 31, 2023

Bravo Luck Adversary Proceeding **\$6,652.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	NAB	Correspond with F. Lawall (Troutman) regarding settlement negotiations	0.40	1,625.00	650.00
08/03/2023	ECS1	Correspond with N. Bassett regarding rule 9019 motion and related settlement agreement with Bravo Luck and Qiang Guo (.2); correspond with J. Kuo regarding filing of same (.1)	0.30	1,015.00	304.50
08/03/2023	NAB	Correspond with F. Lawall (Troutman) regarding Bravo Luck settlement	0.10	1,625.00	162.50
08/04/2023	AB21	Correspond with N. Bassett and E. Sutton regarding update on rule 9019 motion (0.1); correspond with C. Abrehart (Genever BVI director) regarding Bravo Luck settlement (0.2); call and correspond with L. Despins regarding same (0.1)	0.40	1,625.00	650.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00018
Invoice No. 2371622

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/2023	ECS1	Prepare rule 9019 motion and motion to limit service re Bravo Luck settlement agreement (1.5); correspond with N. Bassett regarding same (.2); correspond with J. Kuo regarding filing of same (.2); correspond with P. Linsey (NPM) regarding same (.3)	2.20	1,015.00	2,233.00
08/04/2023	JK21	Prepare certificate of service regarding rule 9019 motion and motion to limit service	0.40	540.00	216.00
08/04/2023	AEL2	Correspond with F. Lawall re: Bravo Luck agreement	0.20	1,625.00	325.00
08/04/2023	NAB	Review and revise settlement agreement, motion, and motion to limit service (.6); correspond with E. Sutton regarding same (.2); correspond with F. Lawall (Troutman) regarding same (.2)	1.00	1,625.00	1,625.00
08/07/2023	JK21	Review and comment on service of rule 9019 motion and motion to limit service (0.4); revise certificate of service regarding rule 9019 motion and motion to limit service (0.2); correspond with P. Linsey (NPM) regarding certificate of service (0.1)	0.70	540.00	378.00
08/08/2023	JK21	Correspond with P. Linsey (NPM) regarding service of rule 9019 motion	0.20	540.00	108.00
Subtotal: B191 General Litigation			5.90		6,652.00
Total			5.90		6,652.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
NAB	Nicholas A. Bassett	Partner	1.50	1,625.00	2,437.50
AB21	Alex Bongartz	Of Counsel	0.40	1,625.00	650.00
AEL2	Luft, Avi E.	Of Counsel	0.20	1,625.00	325.00
ECS1	Ezra C. Sutton	Associate	2.50	1,015.00	2,537.50
JK21	Jocelyn Kuo	Paralegal	1.30	540.00	702.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan
Kwok
50687-00018
Invoice No. 2371622

Page 3

Current Fees and Costs	\$6,652.00
Total Balance Due - Due Upon Receipt	<u><u>\$6,652.00</u></u>



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371623

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

SN Apartment Adversary Proceeding

PH LLP Client/Matter # 50687-00019

Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$132.00

Current Fees and Costs Due

\$132.00

Total Balance Due - Due Upon Receipt

\$132.00

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371623

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

SN Apartment Adversary Proceeding

PH LLP Client/Matter # 50687-00019

Luc A. Despins

Legal fees for professional services
for the period ending August 31, 2023

\$132.00

Current Fees and Costs Due

\$132.00

Total Balance Due - Due Upon Receipt

\$132.00

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September 18, 2023

Please Refer to
Invoice Number: 2371623

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending August 31, 2023

SN Apartment Adversary Proceeding **\$132.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/08/2023	DEB4	Correspond with P. Linsey (NPM) regarding notice of hearing	0.10	1,320.00	132.00
Subtotal: B191 General Litigation			0.10		132.00
Total			0.10		132.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
DEB4	Douglass E. Barron	Associate	0.10	1,320.00	132.00

Current Fees and Costs **\$132.00**
Total Balance Due - Due Upon Receipt **\$132.00**



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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371624

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Greenwich Land Adversary Proceeding

PH LLP Client/Matter # 50687-00020

Luc A. Despins

Legal fees for professional services for the period ending August 30, 2023	\$411,194.50
Costs incurred and advanced	474.40
Current Fees and Costs Due	\$411,668.90
Total Balance Due - Due Upon Receipt	\$411,668.90

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Luc Despins as Chapter 11 Trustee in the case of Ho
Wan Kwok
200 Park Avenue
New York, NY 10166

September 18, 2023

Please Refer to
Invoice Number: 2371624

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Greenwich Land Adversary Proceeding

PH LLP Client/Matter # 50687-00020

Luc A. Despins

Legal fees for professional services for the period ending August 30, 2023	\$411,194.50
Costs incurred and advanced	474.40
Current Fees and Costs Due	\$411,668.90
Total Balance Due - Due Upon Receipt	\$411,668.90

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September 18, 2023

Please Refer to
 Invoice Number: 2371624

Attn: Luc Despins

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
 for the period ending August 30, 2023

Greenwich Land Adversary Proceeding

\$411,194.50

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 General Litigation					
08/01/2023	DEB4	Conference with , A. Luft and N. Bassett regarding witness declaration (0.6); review and comment on issues regarding same (0.2)	0.80	1,320.00	1,056.00
08/01/2023	DEB4	Correspond with P. Linsey (NPM) regarding Bank of Princeton documents	0.50	1,320.00	660.00
08/01/2023	DEB4	Correspond with N. Bassett and A. Luft regarding witness	0.10	1,320.00	132.00
08/01/2023	ECS1	Review documents potentially being produced to Greenwich Land in connection with its adversary proceeding (3.1); correspond with about same (.1)	3.20	1,015.00	3,248.00
08/01/2023	AEL2	Call with D. Barron, and N. Bassett re: informant's potential testimony	0.60	1,625.00	975.00
08/01/2023	AEL2	Analyze Greenwich Land correspondence with Krasner for use in discovery	0.60	1,625.00	975.00
08/01/2023		Prepare draft of witness declaration	0.40	815.00	326.00
08/01/2023		Review production on Relativity for Greenwich Land initial production	3.40	815.00	2,771.00

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2371624

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023		Conference with D. Barron, N. Bassett and A. Luft on Greenwich Land potential witness	0.60	815.00	489.00
08/01/2023	NAB	Call with A. Luft, D. Barron and regarding discovery and litigation strategy (.6); review correspondence from W. Farmer and producing parties' counsel regarding protective order issues (.2)	0.80	1,625.00	1,300.00
08/01/2023	WCF	Correspond with producing party custodians regarding consent to Trustee document production and protective order	0.40	1,235.00	494.00
08/02/2023	DEB4	Correspond with N. Bassett regarding Greenwich Land investigation (0.1); conference with A. Luft regarding same (0.4); correspond with J. Kosciwicz regarding Savio subpoena and request for production (0.3)	0.80	1,320.00	1,056.00
08/02/2023	AEL2	Meet and confer with Greenwich Land counsel and W. Farmer re: respective responses and objections (.9); follow up analysis of open issues and next steps (.5)	1.40	1,625.00	2,275.00
08/02/2023	AEL2	Review objections and responses in preparation for meet and confer (.9); conference with D. Barron regarding same and Greenwich Land investigation (.4)	1.30	1,625.00	2,112.50
08/02/2023	NAB	Correspond with W. Farmer regarding Greenwich Land document discovery issues (.2); review summary of Greenwich Land bank records (.2); correspond with D. Barron regarding same (.1)	0.50	1,625.00	812.50

Luc Despins as Chapter 11 Trustee in the case of Ho Wan Kwok
50687-00020
Invoice No. 2371624

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/02/2023	WCF	Correspond with UnitedLex (M. Coleman and S. Phan) regarding document collection parameters, targeted search structure, and document review issues (.6); call with C. Major and A. Kim (Greenwich Land), and A. Luft regarding discovery issues and productions (.9); conduct second-level review of documents for production to defendants for privilege and responsiveness (1.8)	3.30	1,235.00	4,075.50
08/03/2023	DEB4	Conferences with J. Kosciwicz regarding requests for production for Nicholas Savio (0.3); analyze same (0.3)	0.60	1,320.00	792.00
08/03/2023	DEB4	Correspond with regarding witness	0.10	1,320.00	132.00
08/03/2023	JPK1	Revise requests for production for Nicholas Savio (1.4); calls with D. Barron regarding the same (.3)	1.70	915.00	1,555.50
08/03/2023	AEL2	Analyze and prepare responses to defendants' objections raised during meet and confer	1.20	1,625.00	1,950.00
08/03/2023	AEL2	Correspond with C. Major re: deposition scheduling	0.20	1,625.00	325.00
08/03/2023	AEL2	Review submissions and prepare outline for meet and confer with defendants re: discovery	1.10	1,625.00	1,787.50
08/03/2023	AEL2	Review and comment on Savio discovery requests	0.80	1,625.00	1,300.00
08/03/2023	AEL2	Meet and confer with defendants re: discovery objections	2.10	1,625.00	3,412.50
08/03/2023	NAB	Correspond with W. Farmer regarding Greenwich Land document discovery issues (.2); review summary of Greenwich Land bank records (1.2); correspond with D. Barron regarding same (.1)	1.50	1,625.00	2,437.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2023	WCF	Correspond with S. Phan (UnitedLex) regarding production revisions and update (.3); conduct second-level review of documents for production regarding privilege and responsiveness (3.9)	4.20	1,235.00	5,187.00
08/03/2023	WCF	Continue second-level review of custodian documents for production to defendants regarding privilege and responsiveness	3.70	1,235.00	4,569.50
08/04/2023	DEB4	Correspond with J. Kosciwicz regarding subpoena service	0.10	1,320.00	132.00
08/04/2023	JPk1	Revise subpoena and document requests to Nicholas Savio (.9); analyze application of Federal Rule of Civil Procedure 45 and notice requirement (.4); correspond with E. Sutton regarding the subpoena and document requests to Nicholas Savio (.3); correspond with A. Luft regarding the same (.1); correspond with D. Barron regarding the same (.1); correspond with C. Major regarding the same (.1); correspond with Metro Attorney Services regarding the same (.2)	2.10	915.00	1,921.50
08/04/2023	AEL2	Correspond with W. Farmer re: discovery responses to defendants' RFPs	0.50	1,625.00	812.50
08/04/2023	WCF	Correspond with S. Phan (UnitedLex) regarding specifications for document productions to defendants	0.20	1,235.00	247.00
08/05/2023	NAB	Correspond with W. Farmer regarding discovery issues	0.20	1,625.00	325.00
08/05/2023	WCF	Correspond with J. Moriarty (Zeisler) regarding privilege review of documents to be produced by Trustee to Greenwich Land defendants	0.30	1,235.00	370.50
08/07/2023	DEB4	Conference with regarding upcoming depositions	0.30	1,320.00	396.00
08/07/2023	DEB4	Conference with A. Luft regarding upcoming depositions	0.40	1,320.00	528.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	JPK1	Correspond with A. Luft regarding subpoena service on N. Savio (.1); correspond with E. Cohan regarding the same (.1)	0.20	915.00	183.00
08/07/2023	AEL2	Correspond with re: questions about potential witness	0.20	1,625.00	325.00
08/07/2023	AEL2	Strategic planning re: discovery disputes with defendants	0.30	1,625.00	487.50
08/07/2023	AEL2	Correspond with W. Farmer and D. Barron re: follow up information for C. Major	0.20	1,625.00	325.00
08/07/2023	AEL2	Call with N. Bassett and W. Farmer re: prep for meet & confer call with Greenwich Land counsel	0.20	1,625.00	325.00
08/07/2023	AEL2	Analyze informant's testimony	0.70	1,625.00	1,137.50
08/07/2023	AEL2	Correspond with L. Despins re: potential witness testimony	0.20	1,625.00	325.00
08/07/2023	AEL2	Call with D. Barron re: Greenwich Land deposition outlines (.4); review issues regarding same (.1)	0.50	1,625.00	812.50
08/07/2023	AEL2	Correspond with E. DeNeere re: witness deposition	0.20	1,625.00	325.00
08/07/2023	AEL2	Correspond with N. Bassett re: deposition plan and follow up discovery	0.80	1,625.00	1,300.00
08/07/2023	AEL2	Meet and confer with C. Major and A. Kim (Greenwich Land counsel), N. Bassett, and W. Farmer re: discovery	1.30	1,625.00	2,112.50
08/07/2023		Phone call with D. Barron on upcoming depositions	0.30	815.00	244.50
08/07/2023	NAB	Call with A. Luft and W. Farmer regarding Greenwich Land discovery (.2); meet & confer call with A. Luft, W. Farmer, and C. Major (Greenwich Land counsel) regarding same (1.3)	1.50	1,625.00	2,437.50
08/07/2023	NAB	Correspond with A. Luft and regarding discovery issues	0.10	1,625.00	162.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/07/2023	WCF	Preparatory call with N. Bassett and A. Luft regarding Greenwich Land discovery (.2); call with C. Major, A. Kim (Greenwich Land), N. Bassett, and A. Luft regarding ongoing discovery (1.3); draft discovery summary for Greenwich Land meet & confer follow-up email (.5); correspond with N. Bassett and A. Luft regarding meet & confer response (.2); draft production letter regarding volumes one and three going to defendants (.4)	2.60	1,235.00	3,211.00
08/08/2023	AEL2	Prepare plan and topic list for Greenwich Land witness depositions	2.70	1,625.00	4,387.50
08/08/2023	AEL2	Correspond with regarding subpoena questions	0.30	1,625.00	487.50
08/08/2023	AEL2	Revise draft correspondence to re: subpoena	0.60	1,625.00	975.00
08/08/2023		Draft email to witness to answer his question on the deposition	1.20	815.00	978.00
08/08/2023		Phone call with witness about upcoming deposition	0.20	815.00	163.00
08/09/2023	DEB4	Analyze Greenwich Land documents	0.50	1,320.00	660.00
08/09/2023	DEB4	Correspond with P. Linsey (NPM) regarding Bento production	0.10	1,320.00	132.00
08/09/2023	DEB4	Conference with A. Luft and regarding upcoming depositions	1.20	1,320.00	1,584.00
08/09/2023	JPK1	Correspond with D. Barron regarding follow up document requests to Capital One and First Bank of Greenwich	0.10	915.00	91.50
08/09/2023	JPK1	Review documents related to Capital One, Bank of Princeton, and First Bank of Greenwich bank accounts for Kroll (1.8); correspond with D. Barron regarding the same (.3); correspond with regarding the same (.1)	2.20	915.00	2,013.00
08/09/2023	AEL2	Review topics and related documents before meeting with D. Barron and re: deposition preparation	1.10	1,625.00	1,787.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/09/2023	AEL2	Meet with D. Barron and re: drafting deposition outlines	1.20	1,625.00	1,950.00
08/09/2023	AEL2	Correspond with W. Farmer re: limited waiver language	0.40	1,625.00	650.00
08/09/2023		Correspond with witness on upcoming deposition	0.70	815.00	570.50
08/09/2023		Conference with A. Luft and D. Barron on preparing deposition outlines	1.20	815.00	978.00
08/09/2023		Review Greenwich Land's bank statements at First Bank of Greenwich	0.50	815.00	407.50
08/09/2023	WCF	Correspond with N. Bassett and A. Luft regarding scope of productions to defendants	0.20	1,235.00	247.00
08/10/2023	DEB4	Correspond with P. Linsey (NPM) regarding First Bank Greenwich documents	0.10	1,320.00	132.00
08/10/2023	DEB4	Correspond with regarding Ngoh deposition (0.1); correspond with A. Luft regarding same (0.1)	0.20	1,320.00	264.00
08/10/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding Greenwich Land bank statements	0.20	1,320.00	264.00
08/10/2023	DEB4	Conference with A. Luft regarding Greenwich Land evidence (0.4); conference with L. Despins and A. Luft regarding Greenwich Land transfers and related documents (0.2)	0.60	1,320.00	792.00
08/10/2023	DEB4	Correspond with regarding First Bank of Greenwich transfers	0.30	1,320.00	396.00
08/10/2023	JPk1	Correspond with D. Barron regarding Rule 45 subpoena to Axos Bank	0.10	915.00	91.50
08/10/2023	LAD4	T/c D. Barron and A. Luft re: transfer from Greenwich Land to third parties (.20); review same (.70); review/comment on section 549 issues (1.40)	2.30	1,860.00	4,278.00
08/10/2023	AEL2	Correspond with D. Barron re: follow up subpoenas re: bank records	0.30	1,625.00	487.50
08/10/2023	AEL2	Correspond with E. DeNeere re: upcoming deposition	0.10	1,625.00	162.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/2023	AEL2	Correspond with counsel for Greenwich Land re: upcoming depositions	0.80	1,625.00	1,300.00
08/10/2023	AEL2	Call with L. Despins and D. Barron re: bank records (.2); analyze issues regarding same (1)	0.30	1,625.00	487.50
08/10/2023	AEL2	Call with D. Barron regarding bank records of Greenwich Land	0.40	1,625.00	650.00
08/10/2023		Review Hing Chi Ngok deposition transcripts and July 18, 2023 hearing transcript	0.50	815.00	407.50
08/10/2023		Prepare summary of transfers to and from Greenwich Land on its First Bank of Greenwich account	1.20	815.00	978.00
08/10/2023	WCF	Review and revise decision log for UnitedLex reviewers regarding Greenwich Land responsiveness and privilege issues (.3); second level review of Greenwich Land documents for production to defendants (1.8)	2.10	1,235.00	2,593.50
08/11/2023	DEB4	Correspond with S. Maza regarding motion to withdraw reference	0.10	1,320.00	132.00
08/11/2023	DEB4	Correspond with regarding Sherwood Avenue transaction	0.10	1,320.00	132.00
08/11/2023	AEL2	Meet and confer with J. Moriarty, N. Bassett, and W. Farmer re: privilege waiver	0.50	1,625.00	812.50
08/11/2023		Review recent Greenwich Land production of documents	0.30	815.00	244.50
08/11/2023	NAB	Call with J. Moriarty (Zeisler), W. Farmer, and A. Luft regarding discovery and privilege waiver (.5); analyze same and related case findings (.2)	0.70	1,625.00	1,137.50
08/11/2023	SM29	Preliminary review of reply in support of motion to withdraw reference (.5); email L. Despins, N. Bassett, K. Catalano re same (1)	0.60	1,320.00	792.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/11/2023	WCF	Call with J. Moriarty, N. Bassett, A. Luft regarding privilege waiver and discovery in Greenwich Land matter (.5); correspond with J. Moriarty and S. Phan (ULX) regarding document overlay and privilege withholding (.2); review production from Greenwich Land in adversary proceeding (.3)	1.00	1,235.00	1,235.00
08/12/2023	DEB4	Correspond with W. Farmer regarding witness	0.10	1,320.00	132.00
08/12/2023	DEB4	Conference with regarding witness issues	0.30	1,320.00	396.00
08/12/2023		Correspond with N. Bassett, A. Luft, W. Farmer, and D. Barron about witness (1.3); conference with D. Barron regarding same (.3)	1.60	815.00	1,304.00
08/13/2023	SM29	Review reply in support of motion to withdraw reference (1.4); email L. Despins, N. Bassett, D. Barron, K. Catalano re same (.4)	1.80	1,320.00	2,376.00
08/14/2023	WCF	Correspond with S. Phan (ULX) regarding volume 2 production of documents in Greenwich Land adversary proceeding (.2); analyze privilege documents and comments from counsel to the Debtor (.4)	0.60	1,235.00	741.00
08/15/2023	DEB4	Correspond with regarding deposition prep (0.2); correspond with A. Luft regarding same (0.3)	0.50	1,320.00	660.00
08/15/2023	DEB4	Correspond with regarding Bank of Princeton	0.10	1,320.00	132.00
08/15/2023	DEB4	Correspond with L. Despins regarding deposition prep	0.10	1,320.00	132.00
08/15/2023	ECS1	Review key documents in connection with the deposition of Hing Chi Ngok in the Greenwich Land adversary proceeding	0.10	1,015.00	101.50
08/15/2023	JPK1	Correspond with P. Linsey regarding additional Rule 2004 requests to Capital One and Bank of Princeton	0.30	915.00	274.50

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08/15/2023	AEL2	Correspond with P. Linsey (NPM) re: bank document discovery	0.20	1,625.00	325.00
08/15/2023		Prepare deposition preparation outline for L. Despins' deposition	0.90	815.00	733.50
08/15/2023		Prepare exhibits and exhibit list for Greenwich Land's complaint	1.50	815.00	1,222.50
08/15/2023	WCF	Correspond with A. Luft and N. Bassett regarding discovery dispute with HCHK intervenors (.2); correspond with S. Phan (ULX) regarding remaining document productions (.2)	0.40	1,235.00	494.00
08/16/2023	DEB4	Conference with regarding L. Despins deposition prep (2.5); further conference with A. Luft and regarding same (3.8); analyze documents related to deposition prep (2.3); correspond with N. Bassett regarding witness (0.1)	8.70	1,320.00	11,484.00
08/16/2023	LAD4	Meeting with A. Luft re: privilege issues	0.20	1,860.00	372.00
08/16/2023	AEL2	Correspond with W. Farmer re: privilege waiver	0.30	1,625.00	487.50
08/16/2023	AEL2	Meeting with L. Despins re: privilege waiver and deposition topics	0.20	1,625.00	325.00
08/16/2023	AEL2	Correspond with N. Bassett and re: witness discovery	0.30	1,625.00	487.50
08/16/2023	AEL2	Correspond with W. Farmer and D. Barron re: discovery needed from defendants	0.20	1,625.00	325.00
08/16/2023	AEL2	Meet with D. Barron and re: L. Despins deposition outline	3.80	1,625.00	6,175.00
08/16/2023	AEL2	Review pleadings and discovery responses for L. Despins deposition prep	3.20	1,625.00	5,200.00
08/16/2023	AEL2	Correspond with Whitman Breed re: defendants' letter re: discovery	0.20	1,625.00	325.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2023		Conference with D. Barron regarding L. Despins deposition prep (2.5); further conference with A. Luft and D. Barron regarding same (3.8); continue preparing outline for L. Despins deposition preparation (1.9)	8.20	815.00	6,683.00
08/16/2023	SM29	Correspond with D. Barron in connection with L. Despins depo prep	0.20	1,320.00	264.00
08/16/2023	WCF	Correspond with counsel to Greenwich Land defendants regarding Trustee's document productions (.3); analyze sub-set of privilege documents regarding Debtor holdback and waiver of privilege for production in Greenwich Land dispute (1.9); correspond with A. Luft and N. Bassett regarding same (.2)	2.40	1,235.00	2,964.00
08/17/2023	DEB4	Analyze documents in connection with L. Despins deposition prep	2.20	1,320.00	2,904.00
08/17/2023	DEB4	Conference with regarding L. Despins deposition prep	2.80	1,320.00	3,696.00
08/17/2023	AEL2	Meet and confer with counsel to Greenwich Land re: objection to rule 2004 motion	0.20	1,625.00	325.00
08/17/2023	AEL2	Correspond with W. Farmer re: issues related to deficiencies on Greenwich Land interrogatory responses and document production	0.30	1,625.00	487.50
08/17/2023	AEL2	Review issues and prepare notes for meet and confer with Greenwich Land re: objection to rule 2004 motion	0.20	1,625.00	325.00
08/17/2023	AEL2	Outline motion to compel issues for responses to interrogatories and document requests	1.10	1,625.00	1,787.50
08/17/2023	AEL2	Review documents to prepare for Greenwich Land depositions	3.10	1,625.00	5,037.50
08/17/2023	AEL2	Draft response to Debtor counsel re: privilege waiver	0.80	1,625.00	1,300.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2023	AEL2	Correspond with counsel for Greenwich Land re: their objection to our rule 2004 motion as it relates to Greenwich Land and deficiencies in their production	0.40	1,625.00	650.00
08/17/2023		Prepare outline for L. Despins' deposition preparation with D. Barron (2.8); further prepare outline and review related documents for same (4.8)	7.60	815.00	6,194.00
08/17/2023	SM29	Email D. Barron re deposition prep outline and line of questions	0.30	1,320.00	396.00
08/17/2023	WCF	Analyze limited privilege waiver (.2); correspond with J. Moriarty, A. Luft, N. Bassett regarding limited privilege waiver for production of Debtor documents in Greenwich Land adversary proceeding (.6); continue second level review of privileged material documents in Greenwich Land adversary proceeding regarding same (1.4)	2.20	1,235.00	2,717.00
08/18/2023	DEB4	Conference with A. Luft and regarding deposition prep (2.7); follow up conference with regarding same (0.2); correspond with J. Lazarus (Kroll) regarding Greenwich Land transfers (0.1)	3.00	1,320.00	3,960.00
08/18/2023	LAD4	T/c S. Maza re: reference withdrawal (.30); review/comment on same (1.80)	2.10	1,860.00	3,906.00
08/18/2023	AEL2	Analyze V. Stevens testimony to use for discovery	0.80	1,625.00	1,300.00
08/18/2023	AEL2	Meet with D. Barron and re: Trustee deposition prep outline (2.7); further analyze documents and issues in preparing for Trustee deposition (1.4)	4.10	1,625.00	6,662.50
08/18/2023	AEL2	Review pleadings for L. Despins deposition prep	3.10	1,625.00	5,037.50
08/18/2023		Conference with A. Luft and D. Barron on outline for L. Despins' deposition prep (2.7); follow up conference with D. Barron regarding same (.2)	2.90	815.00	2,363.50

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08/18/2023		Prepare parts of outline for L. Despins' deposition preparation	3.30	815.00	2,689.50
08/18/2023	SM29	Call with L. Despins re withdrawal of the reference (.3); correspond with P. Linsey (NPM) re same (.1)	0.40	1,320.00	528.00
08/18/2023	WCF	Draft deposition prep section regarding document productions, privilege, and waiver issues for L. Despins deposition	0.60	1,235.00	741.00
08/19/2023	DEB4	Prepare parts of L. Despins deposition prep outline	1.80	1,320.00	2,376.00
08/19/2023	DEB4	Correspond with L. Despins regarding G Club arbitration	0.10	1,320.00	132.00
08/19/2023	LAD4	Review documents and legal issues to prepare for depo	2.80	1,860.00	5,208.00
08/19/2023		Prepare parts of outline for L. Despins' deposition preparation	3.30	815.00	2,689.50
08/19/2023		Review Martha Jeffrey document production	1.00	815.00	815.00
08/20/2023	DEB4	Correspond with regarding L. Despins deposition prep	0.10	1,320.00	132.00
08/20/2023	LAD4	Continue to review documents and issues to prepare for depo	3.40	1,860.00	6,324.00
08/20/2023		Prepare parts of E. deNeree deposition outline	4.90	815.00	3,993.50
08/20/2023		Review Whitman Breed production for information related to Greenwich Land, Ferncliff and Taconic Properties	1.30	815.00	1,059.50
08/21/2023	DEB4	Conference with , L. Despins, and A. Luft regarding deposition prep	3.50	1,320.00	4,620.00
08/21/2023	JPK1	Update Rule 45 subpoena to N. Savio (.1); correspond with A. Luft regarding the same (.1); correspond with E. Cohan regarding the same (.1)	0.30	915.00	274.50
08/21/2023	JPK1	Prepare deposition subpoena for witness (.4); correspond with A. Luft regarding the same (.1)	0.50	915.00	457.50

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08/21/2023	LAD4	Prepare for my depo with A. Luft, D. Barron and (3.50); review documents re: same (1.70)	5.20	1,860.00	9,672.00
08/21/2023	AEL2	Review legal issues and documents and supplement outline for L. Despins depo preparation session	4.40	1,625.00	7,150.00
08/21/2023	AEL2	Participate in L. Despins deposition preparation session with L. Despins, D. Barron, and	3.50	1,625.00	5,687.50
08/21/2023		Continue to review Martha Jeffrey documents	0.50	815.00	407.50
08/21/2023		Participate in L. Despins deposition preparation with L. Despins, A. Luft and D. Barron	3.50	815.00	2,852.50
08/21/2023		Prepare documents and outline for Trustee's deposition preparation	1.40	815.00	1,141.00
08/21/2023	NAB	Correspond with P. Linsey (NPM) regarding motion to withdraw the reference (.1); analyze legal issues relating to same (.1); review documents and prepare outline for deposition of E. DeNeere (3.2); correspond with regarding same (.1)	3.50	1,625.00	5,687.50
08/22/2023	DEB4	Correspond with A. Luft regarding L. Despins deposition	0.10	1,320.00	132.00
08/22/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding Capital One documents	0.10	1,320.00	132.00
08/22/2023	DEB4	Correspond with A. Luft regarding interrogatories	0.20	1,320.00	264.00
08/22/2023	JPK1	Correspond with A. Luft regarding motion to compel Greenwich Land	0.10	915.00	91.50
08/22/2023	JPK1	Correspond with W. Farmer regarding motion to compel Greenwich Land	0.20	915.00	183.00
08/22/2023	AEL2	Draft discovery plans for outstanding Greenwich Land discovery	0.80	1,625.00	1,300.00
08/22/2023	AEL2	Review discovery responses, complaint and exhibits for L. Despins deposition	3.60	1,625.00	5,850.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2023	NAB	Review additional documents for upcoming depositions (.3); correspond with L. Despins regarding same (.1); correspond with L. Despins and P. Linsey (NPM) regarding motion to withdraw the reference (.1)	0.50	1,625.00	812.50
08/22/2023	WCF	Call with J. Moriarty regarding limited privilege waiver and production of Greenwich Land debtor documents (.2); second level review of volume 5 production documents in Greenwich Land adversary proceeding (.6); correspond with S. Phan (ULX) regarding production of same (.1)	0.90	1,235.00	1,111.50
08/23/2023	DEB4	Correspond with regarding Jeffrey documents	0.10	1,320.00	132.00
08/23/2023	DEB4	Correspond with L. Despins regarding Leading Shine NY Limited	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with N. Bassett regarding DeNeree deposition	0.20	1,320.00	264.00
08/23/2023	DEB4	Prepare Conboy declaration	0.80	1,320.00	1,056.00
08/23/2023	DEB4	Correspond with L. Despins regarding Trustee deposition	0.20	1,320.00	264.00
08/23/2023	DEB4	Prepare Valerie Stevens declaration	1.80	1,320.00	2,376.00
08/23/2023	DEB4	Correspond with A. Luft regarding Greenwich Land discovery	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with E. Sutton regarding Dinzzang Wong (0.1); correspond with C. Major (MSF) regarding same (0.1)	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with L. Despins regarding PJR order	0.20	1,320.00	264.00
08/23/2023	DEB4	Correspond with regarding DeNeree documents	0.10	1,320.00	132.00
08/23/2023	DEB4	Correspond with W. Farmer regarding initial disclosures	0.10	1,320.00	132.00
08/23/2023	ECS1	Review and prepare documents for Greenwich Land deposition	0.40	1,015.00	406.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/23/2023	ECS1	Review transcript of deposition of Trustee in connection with Greenwich Land adversary proceeding (.3); call with P. Linsey (NPM) regarding same (.1)	0.40	1,015.00	406.00
08/23/2023	JPK1	Correspond with A. Luft regarding motion to compel Greenwich Land	0.10	915.00	91.50
08/23/2023	LAD4	Attend my depo from 10:00 am to 4:50 pm	6.40	1,860.00	11,904.00
08/23/2023	AEL2	Review documents and supplement notes in preparation for L. Despins deposition	1.40	1,625.00	2,275.00
08/23/2023	AEL2	Defend L. Despins deposition	6.40	1,625.00	10,400.00
08/23/2023	AEL2	Call with N. Bassett re: Greenwich Land depositions of L. Despins and E. DeNeere	0.60	1,625.00	975.00
08/23/2023	AEL2	Plan for and outline additional witness statements	1.30	1,625.00	2,112.50
08/23/2023		Review L. Despins' deposition testimony regarding his conversation with E. deNeree	0.90	815.00	733.50
08/23/2023		Attend deposition of L. Despins at Meister Seelig & Fein law firm	6.40	815.00	5,216.00
08/23/2023		Review deposition outline and exhibits for E. de Neree deposition	0.70	815.00	570.50
08/23/2023	NAB	Review legal issues and supplement outline for N. DeNeere deposition (2.1); review documents produced in discovery related to same (.8); review updates on additional discovery items (.3); correspond with L. Despins regarding Trustee deposition (.2); conference with A. Luft regarding same and related issues (.6)	4.00	1,625.00	6,500.00
08/23/2023	WCF	Second level review of M. Jeffrey (Sothebys) documents regarding Greenwich Land complaint (.6); correspond with UnitedLex regarding volume six document production, parameters, and submission (.2)	0.80	1,235.00	988.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	DEB4	Correspond with J. Lazarus (Kroll) regarding Greenwich Land account investigation (0.1); correspond with M. Thomason (WBAM) regarding discovery issues (0.1)	0.20	1,320.00	264.00
08/24/2023	JPK1	Prepare subpoena for deposition to Mei Guo (.3); correspond with opposing counsel regarding the same (.1)	0.40	915.00	366.00
08/24/2023	LAD4	T/c N. Bassett (3) re: depo of broker (.40); listen to portion of same (1.30); t/c N. Bassett and A. Luft re: need for additional discovery (.40)	2.10	1,860.00	3,906.00
08/24/2023	AEL2	Call with L. Despins and N. Bassett regarding case plan and additional discovery (.4); correspond with N. Bassett and P. Linsey re: disclosures re: banks (.8)	1.20	1,625.00	1,950.00
08/24/2023	AEL2	Draft Conboy proposed evidence	3.80	1,625.00	6,175.00
08/24/2023		Attend deposition of Emile de Neree	3.60	815.00	2,934.00
08/24/2023	NAB	Review documents and supplement outline for N. DeNeere deposition (1.7); correspond with regarding same (.2); calls with L. Despins regarding same (.2); participate in N. DeNeere deposition (3.6); follow-up call with L. Despins regarding same (.2); call with L. Despins and A. Luft regarding same and litigation strategy (.4)	6.30	1,625.00	10,237.50
08/25/2023	DEB4	Conference with A. Luft and J. Lazarus (Kroll) regarding Greenwich Land bank statements (1.5); conferences with regarding deposition prep related to Ngok and Mei Guo (3.1)	4.60	1,320.00	6,072.00
08/25/2023	JPK1	Analyze Second Circuit case law regarding inability of limited liability company to plead the Fifth Amendment (.2); analyze Second Circuit case law regarding inability of corporate representative to plead the Fifth Amendment as to records held in corporate capacity (.2)	0.40	915.00	366.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/25/2023	JPK1	Correspond with P. Linsey (NPM) regarding authentication declarations	0.10	915.00	91.50
08/25/2023	AEL2	Draft proposed witness declaration	3.10	1,625.00	5,037.50
08/25/2023	AEL2	Call with Jordan (Kroll) and D. Barron to go over flow of Greenwich Land funds	1.50	1,625.00	2,437.50
08/25/2023	AEL2	Review documents and prepare questions for call with Kroll re: Greenwich Land transfer of funds	0.40	1,625.00	650.00
08/25/2023		Conferences with D. Barron on Ngok and Mei Guo depositions	3.10	815.00	2,526.50
08/25/2023		Review production of bank statements on Relativity in connection with Greenwich Land and Ngok	5.30	815.00	4,319.50
08/26/2023		Prepare parts of Ngok deposition outline	2.20	815.00	1,793.00
08/27/2023	DEB4	Analyze documents in connection with Ngok deposition (3.3); correspond with regarding same (0.2); correspond with J. Lazarus (Kroll) regarding bank accounts (0.1); correspond with M. Thomason (WBAM) regarding WBAM discovery issues (0.1)	3.70	1,320.00	4,884.00
08/27/2023		Review Defendant's responses to interrogatories, RFAs and RFPs	0.40	815.00	326.00
08/27/2023		Review Capital One production on Relativity for Greenwich Land related transfers	3.60	815.00	2,934.00
08/27/2023		Prepare parts of Ngok deposition outline	7.50	815.00	6,112.50
08/27/2023	WCF	Review additional document production to counsel for Greenwich Land and Ms. Ngok	0.20	1,235.00	247.00
08/28/2023	DEB4	Review outline for Ngok deposition	0.40	1,320.00	528.00
08/28/2023	DEB4	Correspond with M. Thomason (WBAM) regarding case matters and coordination	0.10	1,320.00	132.00
08/28/2023	DEB4	Correspond with A. Luft regarding Conboy declaration	0.40	1,320.00	528.00
08/28/2023	DEB4	Correspond with regarding Ngok deposition outline	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/2023	AEL2	Email defendants re: Ngok and M. Guo depositions	0.40	1,625.00	650.00
08/28/2023		Prepare parts of Ngok deposition outline	0.60	815.00	489.00
08/28/2023	NAB	Correspond with A. Luft regarding litigation strategy (.4); call with C. Major (opposing counsel) regarding same (.1); correspond with J. Kosciwicz regarding same (.2)	0.70	1,625.00	1,137.50
08/29/2023	DEB4	Conference with M. Thomason (WBAM), A. Luft, J. Kosciwicz, and N. Bassett regarding evidentiary issues (0.5); prepare documents for M. Thomason regarding same (2.2)	2.70	1,320.00	3,564.00
08/29/2023	ECS1	Call with N. Bassett, A. Luft, A. Romney (Zeisler and Zeisler) and counsel for Mei Guo regarding potential deposition in Greenwich Land adversary proceeding and discovery in Mei Guo adversary proceeding	1.00	1,015.00	1,015.00
08/29/2023	JPK1	Review issues and notes regarding Greenwich Land's responses and objections to interrogatories (.3); attend meet and confer with Greenwich Land's counsel, N. Bassett, A. Luft, E. Sutton regarding same (1.0)	1.30	915.00	1,189.50
08/29/2023	AEL2	Review issues and prepare notes for meet and confer with C. Major re: interrogatory responses	0.60	1,625.00	975.00
08/29/2023	AEL2	Review family testimony re: ownership of Greenwich Land and homes	2.20	1,625.00	3,575.00
08/29/2023	AEL2	Call with N. Bassett re: upcoming discovery plan	0.20	1,625.00	325.00
08/29/2023	AEL2	Meet and confer with defendants (C. Major), N. Bassett, J. Kosciwicz, E. Sutton re: inadequate interrogatory responses	1.00	1,625.00	1,625.00
08/29/2023	AEL2	Email C. Major re: production of disputed discovery	0.30	1,625.00	487.50
08/29/2023	AEL2	Correspond with D. Barron re: deposition plan	0.80	1,625.00	1,300.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/29/2023	AEL2	Call with counsel for Whitman Breed, N. Bassett, D. Barron re: Conboy testimony	0.50	1,625.00	812.50
08/29/2023		Prepare parts of Ngok deposition outline	1.90	815.00	1,548.50
08/29/2023	NAB	Correspond with regarding interrogatory issues (.1); review defendants' interrogatory responses and correspondence related to same (.3); conference with A. Luft regarding same and litigation strategy (.2); participate in meet and confer with A. Luft, J. Kosciwicz, E. Sutton, C. Major (defense counsel) regarding interrogatory responses, document productions, and depositions (1.0); call with A. Luft, D. Barron and counsel to M. Conboy regarding document production issues and proposed declaration (.5); call with A. Romney (Zeisler) regarding Mei Guo subpoena for deposition (.2)	2.30	1,625.00	3,737.50
08/30/2023	DEB4	Correspond with M. Thomason (WBAM) regarding subpoena (0.1); correspond with regarding depositions (0.2); conference with A. Luft regarding same (0.3)	0.60	1,320.00	792.00
08/30/2023	JPk1	Prepare deposition subpoena for M. Conboy (.2); correspond with D. Barron regarding the same (.1); correspond with A. Luft regarding the same (.1)	0.40	915.00	366.00
08/30/2023	AEL2	Correspond with Kroll re: witness service attempt	0.20	1,625.00	325.00
08/30/2023	AEL2	Correspond with M. Thompson re: Conboy testimony	0.50	1,625.00	812.50
08/30/2023	AEL2	Call with D. Barron re: bank discovery re: Greenwich Land accounts	0.30	1,625.00	487.50
08/30/2023	AEL2	Call with N. Bassett re: Greenwich Land discovery questions and witness strategy	0.80	1,625.00	1,300.00
08/30/2023	AEL2	Analyze potential authentication arguments for agreements	0.60	1,625.00	975.00
08/30/2023	AEL2	Correspond with re: outreach to witness	0.20	1,625.00	325.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/30/2023		Prepare subpoena to witness (0.3); prepare Mei Guo deposition outline (0.5); review Capital One production and Bank of Princeton production (0.4)	1.20	815.00	978.00
08/30/2023	NAB	Call with A. Luft regarding witness strategy and discovery issues	0.80	1,625.00	1,300.00
Subtotal: B191 General Litigation			316.60		411,194.50
Total			316.60		411,194.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
LAD4	Luc A. Despins	Partner	24.50	1,860.00	45,570.00
NAB	Nicholas A. Bassett	Partner	23.40	1,625.00	38,025.00
AEL2	Luft, Avi E.	Of Counsel	86.20	1,625.00	140,075.00
SM29	Shlomo Maza	Associate	3.30	1,320.00	4,356.00
DEB4	Douglass E. Barron	Associate	47.70	1,320.00	62,964.00
WCF	Will C. Farmer	Associate	26.10	1,235.00	32,233.50
ECS1	Ezra C. Sutton	Associate	5.10	1,015.00	5,176.50
JPK1	Jon P. Kosciwicz	Associate	10.50	915.00	9,607.50
		Associate	89.80	815.00	73,187.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
08/01/2023	Photocopy Charges	41.00	0.08	3.28
08/15/2023	Photocopy Charges	2,650.00	0.08	212.00
08/16/2023	Photocopy Charges	354.00	0.08	28.32
08/17/2023	Photocopy Charges	177.00	0.08	14.16
08/17/2023	Photocopy Charges	177.00	0.08	14.16
08/17/2023	Photocopy Charges	410.00	0.08	32.80

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08/17/2023	Photocopy Charges	476.00	0.08	38.08
08/21/2023	Photocopy Charges	395.00	0.08	31.60
08/02/2023	Lexis/On Line Search			100.00
Total Costs incurred and advanced				\$474.40
Current Fees and Costs				\$411,668.90
Total Balance Due - Due Upon Receipt				\$411,668.90

EXHIBIT G

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

-----X
:
In re: : Chapter 11
:
HO WAN KWOK, *et al.*, : Case No. 22-50073 (JAM)
:
Debtors.¹ : Jointly Administered
:
-----X

**ORDER APPROVING THIRD INTERIM FEE APPLICATION OF PAUL HASTINGS
LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE
PERIOD FROM JULY 1, 2023 THROUGH AUGUST 31, 2023**

Pursuant to 11 U.S.C. §§ 328, 330 and 331, Paul Hastings LLP (the “Applicant”) filed the *Third Interim Fee Application of Paul Hastings LLP for Compensation and Reimbursement of Expenses for the Period from July 1, 2023 through August 31, 2023* on October __, 2023 (the “Application”). After notice and a hearing, and no objection to the Application having been filed by the Office of the United States Trustee, and in the absence of any other objection to the Application; it is hereby

1. ORDERED that the Application is granted and compensation in the amount of \$3,725,984.25, and reimbursement of expenses in the amount of \$146,137.57, are awarded to Paul Hastings, subject to final adjustment and disgorgement in the event all administrative expenses are not paid in full or as provided in the order approving the sale of the Lady May [ECF No. 1953]; it is further

¹ The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

2. ORDERED that nothing herein modifies the Retention Order; it is further

3. ORDERED that the Debtors' estates are authorized to pay the Trustee and Paul Hastings (a) 80% of the fees (*i.e.*, \$2,980,787.40) and (b) 100% of the expense reimbursements (*i.e.*, \$146,137.57) allowed in paragraph 1 above in the aggregate amount of \$3,126,924.97, and the remaining 20% of the fees allowed in paragraph 1 above in the amount of \$745,196.85 shall be held back by the Debtors' estates pending further order of this Court; it is further

4. ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order; it is further

5. ORDERED that the Trustee and Paul Hastings are authorized and empowered to take all necessary actions to implement the relief granted in this Order; it is further

6. ORDERED that notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and it is further

7. ORDERED that all time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).